

**United States Environmental Protection Agency, Region III  
Corrective Action Program**

**FINAL ADMINISTRATIVE RECORD**

**Former Rehrig International  
901 North Lombardy Street  
EPA ID NO. VAD 089 028 377  
Richmond, VA 23220**

**March 18, 2009**

## **Section 1**

### **Statement of Basis**





**UNITED STATES**  
**ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 3**  
**STATEMENT OF BASIS**  
**FORMER REHRIG INTERNATIONAL**  
**RICHMOND, VIRGINIA**  
**EPA ID NO. VAD 089 028 377**  
**MARCH 18, 2009**

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## **I. INTRODUCTION**

### **A. Facility Name**

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Former Rehrig International Facility located at 901 North Lombardy Street, Richmond, VA 23220 (hereinafter referred to as the Facility).

The Facility is subject to the Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k. The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and waste constituents that have occurred at their property.

Information on the Corrective Action Program can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

### **B. Proposed Decision**

This SB explains EPA's proposed decision that Corrective Action is complete and no land use controls are required for the Facility. EPA's proposed decision is based on a review of EPA and Virginia Department of Environmental Quality (VDEQ) files regarding the environmental history of the Facility as presented in the Final RCRA Site Visit Report submitted on March 26, 2007. Based on this review, EPA has concluded that there are no current or unaddressed releases of hazardous waste or hazardous constituents from the Facility.

### **C. Importance of Public Input**

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the remedy selection by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility. The AR contains the complete set of reports that document Facility conditions, including a map of the Facility, in support of EPA's proposed decision. EPA encourages anyone interested to review the AR. A copy of the AR is available for public review from the EPA Region 3 office, the address of which is provided in Section V, below.

EPA will address all significant comments received during the public comment period. If EPA determines that new information or public comments warrant a modification to the proposed decision, EPA will modify the proposed decision or select other alternatives based on such new information and/or public comments. EPA will approve its final decision in a document entitled the Final Decision and Response to Comments (FDRTC).

## **II. FACILITY BACKGROUND**

The Former Rehrig International Facility is located at 901 North Lombardy Street, in Richmond, Virginia. The Facility was constructed in 1904, and was operated by Rehrig International from 1979 until 2000.

The Facility is located in an urban commercial, industrial and residential area. The closest residence is approximately 500 feet from the Facility. The closest surface water body is the James River, 1.6 miles south of the Facility.

Facility operations included manufacturing of shopping carts and shopping baskets. The manufacturing process consisted of metal fabrication, injection molding, and metal plating. Ancillary equipment used by Rehrig included a wastewater treatment system, a diesel fuel Underground Storage Tank (UST), a waste oil Aboveground Storage Tank (AST), and a hydraulic oil AST.

Rehrig's manufacturing activities ceased in 2000, and the Facility was sold in 2002. The Facility has been demolished and a Kroger's grocery store and small retail shops have been constructed in its place.

The Facility at one time operated under interim permit status for container and tank storage. Additionally, the Facility was a large quantity generator (LQG) of hazardous waste.

### **III. SUMMARY OF ENVIRONMENTAL HISTORY**

A 1993 Environmental Site Assessment Update Report identified historical occupants of the Facility to include the State Penitentiary, a book binding business, and an air filter products manufacturer. The Facility was initially constructed by the Export Leaf Tobacco Company and was used for tobacco leaf storage until 1977. Bowe Street Associates purchased the property in 1977. The property remained vacant until 1979 when Rehrig leased a portion of the onsite building. The Facility was again sold in May 2002, to the Broad Street Associates, and again in June 2003 to New River Real Estate. A grocery store and strip mall currently occupy the site.

According to the 1993 Environmental Site Assessment Update Report, the manufacturing process consisted of metal fabrication, injection molding that produced high-density polyethylene (HDPE) parts, and metal plating of nickel and chromium onto the metal parts of the shopping carts (a new plating system was installed in 1993). Ancillary equipment used by Rehrig included a wastewater treatment system, diesel fuel UST, a waste oil AST, and a hydraulic oil AST. Rehrig plated and assembled approximately ¼ million shopping carts and baskets per year.

Hazardous chemical storage areas were used at the site, and Rehrig was a LQG of hazardous waste.

Rehrig treated wastewater generated by the Facility's nickel and chromium electroplating operations in an on-site wastewater treatment system. This wastewater treatment system included 4 stages of treatment in tanks, followed by waste treatment using a filter press to remove water from settled solids. Wastewater from the tanks and filter presses were discharged to the sanitary sewer system in accordance with a Pretreatment Permit issued and administered by the City of Richmond. This Permit was a requirement of the City's Virginia Pollution Discharge Elimination System (VPDES) Municipal Wastewater Treatment Permit issued by the State Water Control Board and VDEQ.

A letter from the Virginia Department of Waste Management to Rehrig dated November 6, 1990 indicated that hazardous waste closure of the Facility had been completed in accordance with the approved closure plan; however, it is not clear if this closure addressed all waste management units.

A Virginia Waste Management Board Consent Order was issued on January 23, 1997 which described numerous violations observed during a July 11, 1996 VDEQ inspection. Violations included administrative items (manifest issues, no job titles for employees who manage hazardous waste, and failure to maintain tank assessment records) and physical violations (failure to keep all containers of hazardous waste closed, storage of incompatible materials, and improper secondary containment). This Order indicated that violations were to be corrected in 90 days. A May 15, 1998, letter from the VDEQ indicated that the facility met the terms of the Order and that the Order had been terminated.

Rehrig operated a wastewater treatment facility under a Pretreatment Permit issued by the City of Richmond; the wastewater discharge from this system was administered and regulated under the City's Municipal VPDES Permit. Rehrig admitted in its plea that in 1998, the company violated its VPDES Permit numerous times by discharging excessive amounts of nickel and chromium (up to 30 times its permitted limits). The City issued Rehrig several citations, and in December 1998 found Rehrig in significant noncompliance with its permit. A May 15, 1998 letter from VDEQ to Rehrig indicated that the Facility met the terms of the Order, and that the Order had been terminated. In early 1999, Rehrig agreed to improve its water treatment system.

In 2001, Rehrig pleaded guilty to criminal violations of the Clean Water Act and was ordered to pay \$500,000 for fines, implement pollution prevention improvements at its plant, and perform community service.

Rehrig continued to periodically violate its VPDES Permit, according to EPA officials. At this time, Rehrig began moving its operations to a new site in neighboring Chesterfield County, Virginia.

Rehrig later acknowledged this discharge occurred as a result of lack of staff resources, according to EPA documents. In late September 1999, after additional permit violations by Rehrig and additional citations by the City of Richmond, Rehrig's discharges violated its permit on each of five consecutive days.

After Rehrig pleaded guilty to two criminal misdemeanors, the company was fined \$200,000, ordered to make a \$290,000 payment for adding pollution prevention/control equipment at its new plant (Chesterfield County Facility), and ordered to make a \$10,000 contribution to the James River Advisory Council, a group formed to protect the River. Rehrig was also required to submit an environmental compliance program to the court and its employees were required to perform 400 hours of community service.

Subsequently, Rehrig replaced its plating manager, plant manager, and vice president for production. Rehrig then contracted with an environmental consulting firm to perform wastewater treatment, and operated in compliance with its Chesterfield County Clean Water Act permit. During an unannounced September 10, 2002 compliance inspection, VDEQ determined that Rehrig no longer operated the site. The VDEQ Office of Waste Programs was requested to deactivate the VAD identification number.

In summary, the hazardous waste releases were addressed and closure was certified by the VDEQ on November 6, 1990 and May 15, 1998. All Clean Water Act violations of the VPDES Permit were resolved by the assessment of fines, implementation of pollution prevention improvements, performing community service and eventually closing of the facility.

#### **IV. EVALUATION OF EPA'S PROPOSED DECISION**

EPA has determined that its proposed decision for the Facility is protective of human health and the environment and that no further corrective action or controls are necessary at this time.

#### **V. PUBLIC PARTICIPATION**

Interested person are invited to comment on EPA's proposed decision. The public comment period will last thirty (30) calendar days from the date the notice is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Mr. Denis Zielinski at the address listed below.

A public meeting will be held upon request. Requests for a public meeting should be made to Mr. Denis Zielinski at the address listed below. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all the information considered by EPA for the proposed decision at this Facility. To receive a copy of the Administrative Record, contact Mr. Denis Zielinski at the address below:

U.S. EPA Region 3  
1650 Arch Street  
Philadelphia, PA 19103  
Contact: Mr. Denis Zielinski (3LC20)  
Phone: (215) 814-3431  
Fax: (215) 814-3114  
Email: [zielinski.denis@epa.gov](mailto:zielinski.denis@epa.gov)

## **Section 2**

### **Environmental Indicator Forms**

## DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

### RCRA Corrective Action

Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name: Former Rehrig International Facility  
Facility Address: 901 North Lombardy Street, Richmond, Virginia  
Facility EPA ID #: VAD 089 028 377

1. Has all available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination?

- ☒ If yes - check here and continue with #2 below.
- ☐ If no - re-evaluate existing data, or
- ☐ If data are not available, skip to #6 and enter "IN" (more information needed) status code.

### BACKGROUND

The former Rehrig facility is located at 901 North Lombardy Street, Richmond, Virginia. The site is located in an urban commercial, industrial, and residential area. According to the City of Richmond property report, the site address is also known as 630 Bowe Street and 800 Bowe Street. The current owner is Kroger Real Estate Department of Roanoke, Virginia.

The first known facility structure was a single building constructed in 1904 by the Export Leaf Tobacco Company and was used for tobacco leaf storage until 1977. Bowe Street Associates purchased the property in 1977. The property remained vacant until 1979 when Rehrig leased a portion of the onsite building. According to the 1993 Environmental Site Assessment Update Report, the State Penitentiary, a book binding business, and an air filter products manufacturer also historically occupied the site. Previous owners were listed as the Broad Street Associates, who purchased the property in May 2002 and New River Real Estate who purchased the property in June 2003.

The Rehrig facility was approximately 250,000 square feet in size. Rehrig manufactured grocery shopping carts and shopping baskets at the site from 1979 to 2000. According to the 1993 Environmental Site Assessment Update Report, the manufacturing process consisted of metal fabrication, injection molding that produced high-density polyethylene (HDPE) parts, and metal plating of nickel and chromium onto the metal parts of the shopping carts (a new plating system was installed in 1993). Ancillary equipment used by Rehrig included a wastewater treatment system, diesel fuel Underground Storage Tank (UST), a waste oil Aboveground Storage Tank (AST), and a hydraulic oil AST. Rehrig plated and assembled approximately ¼ million shopping carts and baskets per year.

The Rehrig facility maintained an onsite wastewater treatment system to treat process water that contained nickel and chromium electroplating operations in an on-site wastewater treatment system. This system discharged treated water to the City of Richmond under a Pretreatment Permit issued and administered by the City of Richmond.

### Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the



environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

#### **Definition of “Current Human Exposures Under Control” EI**

A positive “Current Human Exposures Under Control” EI determination (“YE” status code) indicates that there are no “unacceptable” human exposures to “contamination” (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all “contamination” subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

#### **Relationship of EI to Final Remedies**

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The “Current Human Exposures Under Control” EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program’s overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

#### **Duration / Applicability of EI Determinations**

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

**Current Human Exposures Under Control Center****Environmental Indicator (EI) RCRIS code (CA725)**

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be “contaminated”<sup>1</sup> above appropriately protective risk-based “levels” (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater		X		
Air (indoors) <sup>2</sup>		X		
Surface Soil (e.g., <2 ft)		X		
Surface Water		X		
Sediment		X		
Subsurf. Soil (e.g., >2 ft)		X		
Air (outdoors)		X		

- ☒ If no (for all media) - skip to #6, and enter “YE,” status code after providing or citing appropriate “levels,” and referencing sufficient supporting documentation demonstrating that these “levels” are not exceeded.
- ☐ If yes (for any media) - continue after identifying key contaminants in each “contaminated” medium, citing appropriate “levels” (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.
- ☐ If unknown (for any media) - skip to #6 and enter “IN” status code.

**Rationale and Reference(s):**

Two releases to the environment occurred at the site and were remediated to regulatory agency satisfaction, as follows.

- Hydraulic oil-contaminated soil was discovered during facility expansion activities and removed. This incident was closed to the satisfaction of the State Water Control Board and the Richmond Fire Department.
- Soil contamination below Virginia State Water Control Board reportable levels was detected during a 1989 diesel fuel UST removal activity

No evidence of other spills other releases were found during the November 2, 2006 RCRA Corrective Action site visit.

No groundwater monitoring wells are known to have been installed at the site nor was groundwater encountered in 15-foot deep soil borings advanced in 1993. While groundwater quality is unknown as described below, it is not used for potable purposes. No groundwater wells were located within a three-mile radius of the site at the time of the 1989 Preliminary Assessment Report. The 1989 Preliminary Assessment Report indicated that groundwater contamination was not expected due to the plating tanks having concrete containment systems and the fact that all processes took place indoors.

Potable water is supplied to the former Rehrig site and surrounding area by the City of Richmond. The source of the water is the James River; the intake is approximately three miles upstream and southwest of the site.

City of Richmond Ordinance Division 4 – Water Service Connections, Pipes, and Meters – Section 106-336 – Duties of Owners and Tenants indicates that all newly constructed or existing buildings be connected to the public water service system. The Ordinance also notes that owners who have used another water supply system (for example, a well) that was installed and used prior to January 1, 1970 are not required to have a public water connection if it can be proven that the alternative water supply is not detrimental to public health and safety, as approved by the Richmond City Health District. The ordinance also states that a property owner is able to drill a new potable well provided the Richmond City Health District approves the well and water quality.

TtEC contacted the Richmond City Health District for clarification of this ordinance. An environmental inspector indicated that 98 percent of the City of Richmond is served by municipal water (the vicinity of the site is included in this 98 percent) and that the District does not approve wells for potable use. The inspector reported that if there are any wells in the vicinity of the site, they are for irrigation purposes only.

The former Rehrig site is now the location of a Kroeger's Grocery Store and small retail stores. No documentation was found in VDEQ or USEPA Region III files regarding indoor or outdoor air issues.

Footnotes:

<sup>1</sup> "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

<sup>2</sup> Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

**Current Human Exposures Under Control**  
**Environmental Indicator (EI) RCRIS code (CA725)**

3. Are there **complete pathways** between “contamination” and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

**Summary Exposure Pathway Evaluation Table**

Potential **Human Receptors** (Under Current Conditions)

<b><u>“Contaminated” Media</u></b>	<b>Residents</b>	<b>Workers</b>	<b>Day-Care</b>	<b>Construction</b>	<b>Trespassers</b>	<b>Recreation</b>	<b>Food<sup>3</sup></b>
Groundwater							
Air (indoors)							
Soil (surface, e.g., <2 ft)							
Surface Water							
Sediment							
Soil (subsurface e.g., >2 ft)							
Air (outdoors)							

**Instructions for Summary Exposure Pathway Evaluation Table:**

1. Strike-out specific Media including Human Receptors' spaces for Media, which are not “contaminated” as identified in #2 above.
2. Enter “yes” or “no” for potential “completeness” under each “Contaminated” Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential “Contaminated” Media - Human Receptor combinations (Pathways) do not have check spaces (“\_\_\_”). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

- ☐ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter “YE” status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).
- ☐ If yes (pathways are complete for any “Contaminated” Media - Human Receptor combination) - continue after providing supporting explanation.
- ☐ If unknown (for any “Contaminated” Media - Human Receptor combination) - skip to #6 and enter “IN” status code.

Rationale and Reference(s):

<sup>3</sup> Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

**Current Human Exposures Under Control**  
**Environmental Indicator (EI) RCRIS code (CA725)**

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **“significant”**<sup>4</sup> (i.e., potentially “unacceptable” because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in greater than acceptable risks)?
- ☐ If no (exposures can not be reasonably expected to be significant (i.e., potentially “unacceptable”) for any complete exposure pathway) - skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”
- ☐ If yes (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) - continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”
- ☐ If unknown (for any complete pathway) - skip to #6 and enter “IN” status code

Rationale and Reference(s):

<sup>4</sup> If there is any question on whether the identified exposures are “significant” (i.e., potentially “unacceptable”) consult a human health Risk Assessment specialist with appropriate education, training and experience.

**Current Human Exposures Under Control**  
**Environmental Indicator (EI) RCRIS code (CA725)**

5. Can the “significant” **exposures** (identified in #4) be shown to be within **acceptable** limits?
- ☐ If yes (all “significant” exposures have been shown to be within acceptable limits) - continue and enter “YE” after summarizing and referencing documentation justifying why all “significant” exposures to “contamination” are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).
- ☐ If no - (there are current exposures that can be reasonably expected to be “unacceptable”)- continue and enter “NO” status code after providing a description of each potentially “unacceptable” exposure.
- ☐ If unknown (for any potentially “unacceptable” exposure) - continue and enter “IN” status code.

Rationale and Reference(s):

**Current Human Exposures Under Control  
Environmental Indicator (EI) RCRIS code (CA725)**

6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI (event code CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

- ☒ YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Former R hrig International facility, EPA ID # VAD 089 028 377, located at 901 North Lombardy Street in Richmond, Virginia under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.
- ☐ NO - "Current Human Exposures" are NOT "Under Control."
- ☐ IN - More information is needed to make a determination.

Completed by	(signature) <u>Denis Zielinski</u>	Date <u>1/22/09</u>
	(print) <u>DENIS ZIELINSKI</u>	
	(title) <u>SENIOR RSM</u>	
Supervisor	(signature) <u>[Signature]</u>	Date <u>1/22/09</u>
	(print) <u>JOHN J. [Signature]</u>	
	(title) <u>Associate Director, Land &amp; Chemicals Division</u>	
	(EPA Region or State) <u>Region III</u>	

Locations where References may be found:

US EPA Region III  
Waste & Chemicals Management Division  
1650 Arch Street  
Philadelphia, PA 19103

Contact telephone and e-mail numbers

(name) Denis M. Zielinski  
(phone #) 215-814-3431  
(e-mail) zielinski.denis@epa.gov

**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION**

Interim Final 2/5/99

**RCRA Corrective Action****Environmental Indicator (EI) RCRIS code (CA750)****Migration of Contaminated Groundwater Under Control**

**Facility Name:** Former Rehrig International Facility  
**Facility Address:** 901 North Lombardy Street, Richmond, Virginia  
**Facility EPA ID #:** VAD 089 028 377

1. Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

- ☒ If yes - check here and continue with #2 below.
- ☐ If no - re-evaluate existing data, or
- ☐ If data are not available, skip to #8 and enter "IN" (more information needed) status code.

**BACKGROUND**

The former Rehrig facility is located at 901 North Lombardy Street, Richmond, Virginia. The site is located in an urban commercial, industrial, and residential area. According to the City of Richmond property report, the site address is also known as 630 Bowe Street and 800 Bowe Street. The current owner is Kroger Real Estate Department of Roanoke, Virginia.

The first known facility structure was a single building constructed in 1904 by the Export Leaf Tobacco Company and was used for tobacco leaf storage until 1977. Bowe Street Associates purchased the property in 1977. The property remained vacant until 1979 when Rehrig leased a portion of the onsite building. According to the 1993 Environmental Site Assessment Update Report, the State Penitentiary, a book binding business, and an air filter products manufacturer also historically occupied the site. Previous owners were listed as the Broad Street Associates, who purchased the property in May 2002 and New River Real Estate who purchased the property in June 2003.

The Rehrig facility was approximately 250,000 square feet in size. Rehrig manufactured grocery shopping carts and shopping baskets at the site from 1979 to 2000. According to the 1993 Environmental Site Assessment Update Report, the manufacturing process consisted of metal fabrication, injection molding that produced high-density polyethylene (HDPE) parts, and metal plating of nickel and chromium onto the metal parts of the shopping carts (a new plating system was installed in 1993). Ancillary equipment used by Rehrig included a wastewater treatment system, diesel fuel Underground Storage Tank (UST), a waste oil Aboveground Storage Tank (AST), and a hydraulic oil AST. Rehrig plated and assembled approximately ¼ million shopping carts and baskets per year.

The Rehrig facility maintained an onsite wastewater treatment system to treat process water that contained nickel and chromium electroplating operations in an on-site wastewater treatment system. This system discharged treated water to the City of Richmond under a Pretreatment Permit issued and administered by the City of Richmond.

**Definition of Environmental Indicators (for the RCRA Corrective Action)**

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.



### **Definition of "Migration of Contaminated Groundwater Under Control" EI**

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

### **Relationship of EI to Final Remedies**

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, (GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

### **Duration / Applicability of EI Determinations**

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

**Migration of Contaminated Groundwater Under Control  
Environmental Indicator (EI) RCRIS code (CA750)**

2. Is **groundwater** known or reasonably suspected to be “contaminated” above appropriately protective “levels” (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

- ☐ If yes - continue after identifying key contaminants, citing appropriate “levels,” and referencing supporting documentation.
- ☒ If no - skip to #8 and enter “YE” status code, after citing appropriate “levels,” and referencing supporting documentation to demonstrate that groundwater is not “contaminated.”
- ☐ If unknown - skip to #8 and enter “IN” status code.

**Rationale and Reference(s):**

Two releases to the environment occurred at the site and were remediated to regulatory agency satisfaction.

- Hydraulic oil-contaminated soil was discovered during facility expansion activities and removed. This incident was closed to the satisfaction of the State Water Control Board and the Richmond Fire Department.
- Soil contamination below Virginia State Water Control Board reportable levels was detected during a 1989 diesel fuel UST removal activity

No evidence of other releases to soil or groundwater were found in files reviewed at VDEQ or USEPA Region III offices. No groundwater monitoring wells are known to have been installed at the site nor was groundwater encountered in 15-foot deep soil borings advanced in 1993. Therefore, groundwater quality is unknown. No groundwater wells were located within a three-mile radius of the site at the time of the 1989 Preliminary Assessment Report. The 1989 Preliminary Assessment Report indicated that groundwater contamination was not expected due to the plating tanks having concrete containment systems and the fact that all processes took place indoors.

Potable water is supplied to the former Rehrig site and surrounding area by the City of Richmond. The source of the water is the James River; the intake is approximately three miles upstream and southwest of the site.

“City of Richmond Ordinance Division 4 – Water Service Connections, Pipes, and Meters – Section 106-336 – Duties of Owners and Tenants” indicates that all newly constructed or existing buildings be connected to the public water service system. The Ordinance also notes that owners who have used another water supply system (for example, a well) that was installed and used prior to January 1, 1970 are not required to have a public water connection if it can be proven that the alternative water supply is not detrimental to public health and safety, as approved by the Richmond City Health District. The ordinance also states that a property owner is able to drill a new potable well provided the Richmond City Health District approves the well and water quality.

TtEC contacted the Richmond City Health District for clarification of this ordinance. An environmental inspector indicated that 98 percent of the City of Richmond is served by municipal water (the vicinity of the site is included in this 98 percent) and that the District does not approve wells for potable use. The inspector reported that if there are any wells in the vicinity of the site, they are for irrigation purposes only.

**Footnotes:**

“Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate “levels” (appropriate for the protection of the groundwater resource and its beneficial uses).

**Migration of Contaminated Groundwater Under Control**  
**Environmental Indicator (EI) RCRIS code (CA750)**

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"<sup>2</sup> as defined by the monitoring locations designated at the time of this determination)?
- ☐ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"<sup>2</sup>.
  - ☐ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"<sup>2</sup>) – skip to #8 and enter "NO" status code, after providing an explanation.
  - ☐ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

<sup>2</sup> "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

**Migration of Contaminated Groundwater Under Control  
Environmental Indicator (EI) RCRIS code (CA750)**

4. Does "contaminated" groundwater **discharge** into **surface water** bodies? .

- ☐ If yes - continue after identifying potentially affected surface water bodies.
- ☐ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.
- ☐ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

**Migration of Contaminated Groundwater Under Control  
Environmental Indicator (EI) RCRIS code (CA750)**

5. Is the **discharge** of “contaminated” groundwater into surface water likely to be “**insignificant**” (i.e., the maximum concentration<sup>3</sup> of each contaminant discharging into surface water is less than 10 times their appropriate groundwater “level,” and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?
- ☐ If yes - skip to #7 (and enter “YE” status code in #8 if #7 = yes), after documenting:
- 1) the maximum known or reasonably suspected concentration<sub>3</sub> of key contaminants discharged above their groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and
  - 2) provide a statement of professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.
- ☐ If no - (the discharge of “contaminated” groundwater into surface water is potentially significant) - continue after documenting:
- 1) the maximum known or reasonably suspected concentration<sub>3</sub> of each contaminant discharged above its groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and
  - 2) for any contaminants discharging into surface water in concentrations<sub>3</sub> greater than 100 times their appropriate groundwater “levels,” the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.
- ☐ If unknown - enter “IN” status code in #8.

Rationale and Reference(s):

<sup>3</sup> As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

**Migration of Contaminated Groundwater Under Control  
Environmental Indicator (EI) RCRIS code (CA750)**

6. Can the **discharge** of “contaminated” groundwater into surface water be shown to be “**currently acceptable**” (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented<sup>4</sup>)?
- ☐ If yes - continue after either:
- 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site’s surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater;
  - OR
  - 2) providing or referencing an interim-assessment<sup>5</sup>, appropriate to the potential for impact that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment “levels,” as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.
- ☐ If no - (the discharge of “contaminated” groundwater can not be shown to be “**currently acceptable**”) - skip to #8 and enter “NO” status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.
- ☐ If unknown - skip to 8 and enter “IN” status code.

Rationale and Reference(s):

<sup>4</sup> Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

<sup>5</sup> The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

**Migration of Contaminated Groundwater Under Control**  
**Environmental Indicator (EI) RCRIS code (CA750)**

7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

☐ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations, which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

☐ If no - enter "NO" status code in #8.

☐ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

**Migration of Contaminated Groundwater Under Control  
Environmental Indicator (EI) RCRIS code (CA750)**

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

☒ **YE - Yes**, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Former Rehrig International facility, EPA ID # VAD 089 028 377, located at 901 North Lombardy Street, in Richmond, Virginia. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

☐ **NO - Unacceptable migration of contaminated groundwater is observed or expected.**

☐ **IN - More information is needed to make a determination.**

Completed by

(signature)

*Denis Zielinski*

Date

*1/22/09*

(print) DENIS ZIELINSKI

(title) SENIOR RCM

Supervisor

(signature)

*Raymond P. ...*

Date

*1/22/09*

(print)

(title) Associate Director, Large Chemicals Division

(EPA Region or State) Region III

Locations where References may be found:

US EPA Region III  
Waste & Chemicals Management Division  
1650 Arch Street  
Philadelphia, PA 19103

Contact telephone and e-mail numbers

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(e-mail) zielinski.denis@epa.gov



### **Section 3**

## **RCRA Site Visit Report**



TETRA TECH EC, INC.

March 26, 2007

Denis Zielinski  
United States Environmental Protection Agency  
Region III  
1650 Arch Street  
Mail Code 3WC23  
Philadelphia, PA 19103-2029

**SUBJECT: FINAL RCRA CORRECTIVE ACTION SITE VISIT REPORT**  
**USACE CONTRACT NO. W912BU-04-D-0001**  
**TASK ORDER NO. 0004**

Please find enclosed one paper copy and one electronic copy on CD Rom of the Final RCRA Site Visit Report for the following facility:

Former Rehrig International, 901 North Lombardy Street, Richmond, VA 23220  
USEPA ID # VAD 089 028 377

Please contact me at (215) 702-4023 with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'JDZ', is positioned above the name Jonathan Dziekan.

Jonathan Dziekan  
TtEC Project Manager

Enclosures

Cc: Mr. Richard Criqui (VDEQ – 2 copies)  
Mr. Michael Mohn (USACE)  
Mr. Barry Shelley (Pro Chem)  
Ms. Wendy DeMaio (TtEC)



---

**United States Environmental Protection Agency, Region III  
Corrective Action Program**

**FINAL RCRA SITE VISIT REPORT**

**Former Rehrig International Facility  
USEPA ID # VAD 089 028 377  
901 North Lombardy Street  
Richmond, Virginia 23220**

---

*Prepared for:*



United States Environmental  
Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-4431

Virginia Department of  
Environmental Quality  
629 East Main Street  
Richmond, VA 23219

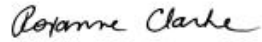


*Prepared by:*

Tetra Tech EC, Inc.  
Bucks Town Corporate Campus  
820 Town Center Drive, Suite 100  
Langhorne, PA 19047

**March 2007**

This RCRA SITE VISIT REPORT (Final) incorporates USEPA, VDEQ and facility representative comments to a DRAFT FINAL Report and has been prepared by:



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Roxanne Clarke  
Environmental Engineer  
Tetra Tech EC, Inc.

3/26/07

Date

The report was approved by:



---

Jonathan Dziekan, EIT  
Project Manager  
Tetra Tech EC, Inc.

3/26/07

Date

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**RCRA SITE VISIT REPORT**  
**Rehrig International**  
**VAD 089 028 377**  
**901 North Lombardy Street**  
**Richmond, Virginia 23220**

## **1.0 PURPOSE**

The purpose of this site report is to consolidate relevant information from Rehrig International (Rehrig) regarding the facility associated with United States Environmental Protection Agency (USEPA) ID Number VAD 089028377. This information will be used to augment the existing facility information.

## **2.0 DOCUMENTATION REVIEW**

Prior to the meeting, Mr. Jonathan Dziekan of Tetra Tech EC, Inc. (TtEC) conducted a review of files on record at the Commonwealth of Virginia Department of Environmental Quality (VDEQ) Central Office in Richmond, Virginia. A similar file review was conducted at the USEPA Region III office in Philadelphia, Pennsylvania. Files from the regional office of VDEQ Piedmont (Tidewater) were provided to TtEC after the site visit. The purpose of this review was to identify known Areas of Concern (AOCs) and Solid Waste Management Units (SWMUs) at the former Rehrig International facility prior to conducting a site visit.

## **3.0 SITE VISIT**

An onsite meeting and a site visit were conducted on November 29, 2006 to discuss the former Rehrig facility located at 901 North Lombardy Street in Richmond, Virginia. A list of attendees at that site visit is as follows:

<b>Name</b>	<b>Company/Agency</b>	<b>Telephone Number</b>	<b>E-mail Address</b>
Roxanne Clarke	TtEC	215-702-4003	Roxanne.Clarke@tteci.com
Jonathan Dziekan	TtEC	215-702-4023	Jonathan.Dziekan@tteci.com
Matthew Stepien	VDEQ	804-698-4026	mmstepien@deq.virginia.gov
Clint Shettle	VDEQ	804-527-5032	ctshettle@deq.virginia.gov
Denis Zielinski	USEPA Region III	215-814-3431	zielinski.denis@epa.gov
Barry Shelley	Pro Chem (consultant representing Rehrig)	540-268-9884	bshelley@prochemweb.com
Patrick Davis	Pro Chem (consultant representing Rehrig)	804-743-9600	pdavis@prochemweb.com

#### **4.0 MEETING SUMMARY**

A meeting at the former Rehrig International facility was held with the attendees noted above on November 29, 2006. Mr. Denis Zielinski, USEPA Region III Resource Conservation and Recovery Act (RCRA) Project Manager, presented the facility with information regarding USEPA Region III's Corrective Action process, the Environmental Indicator Assessment Program, 20/20 Vision, the facility Lead Program, and the policy driving this program.

Mr. Zielinski also discussed Virginia's Brownfields Program in addition to the Virginia Clean Water Revolving Loan fund. The fund allows for the acquisition of low interest Brownfield loans for corrective actions that remediate or protect surface or if groundwater in the Commonwealth of Virginia.

Under this investigation, USEPA Region III is focusing on two interim Environmental Indicators to evaluate whether any unacceptable risk to human health and the environment is ongoing at the facility. The two indicators are determining if human exposures are controlled and if groundwater releases are controlled.

The Facility Lead Program, as described by Mr. Zielinski allows facilities under RCRA Corrective Action to proactively implement measures that resolve Corrective Action Items without a Corrective Action Order or Permit. The Facility Lead Program eliminates administrative burdens and expedites the resolution of Corrective Action Items.

The site visit continued with a brief description of the former facility's activities and corrective actions provided by Mr. Barry Shelley of Pro Chem (Rehrig's consultant). No photographs of specific SWMU areas were taken as the facility has been demolished and a Krogers grocery store and small retail shops were constructed in its place. However, photographs of the general property conditions were taken. Neither the Krogers grocery store nor the small retail shops were toured as part of the site visit. Photographs of the current conditions can be found in Appendix A.

#### **5.0 LOCATION, SUMMARY OF OPERATIONAL AND MANAGEMENT HISTORY, AND DESCRIPTION OF WASTES GENERATED AT THE FACILITY**

The former Rehrig facility is located at 901 North Lombardy Street, Richmond, Virginia. Figure 1, located in Appendix B of this report, provides the Site Location Map. Figure 2, located in Appendix B of this report, provides the Site Layout Map for the facility. Figures 3 and 4 provide Building Layout Maps. The site is located in an urban commercial, industrial, and residential area.

According to the City of Richmond property report, the site address is also known as:

- 630 Bowe Street
- 800 Bowe Street



The current owner is Kroger Real Estate Department of Roanoke, Virginia.

The first known facility structure was a single building constructed in 1904 by the Export Leaf Tobacco Company and was used for tobacco leaf storage until 1977. Bowe Street Associates purchased the property in 1977. The property remained vacant until 1979 when Rehrig leased a portion of the onsite building.

According to the 1993 Environmental Site Assessment Update Report, the State Penitentiary, a book binding business, and an air filter products manufacturer also historically occupied the site. Previous owners were listed as the Broad Street Associates, who purchased the property in May 2002 and New River Real Estate who purchased the property in June 2003.

The Rehrig facility was approximately 250,000 square feet in size. Rehrig manufactured grocery shopping carts and shopping baskets at the site from 1979 to 2000. According to the 1993 Environmental Site Assessment Update Report, the manufacturing process consisted of metal fabrication, injection molding that produced high-density polyethylene (HDPE) parts, and metal plating of nickel and chromium onto the metal parts of the shopping carts (a new plating system was installed in 1993). Ancillary equipment used by Rehrig included a wastewater treatment system, diesel fuel Underground Storage Tank (UST), a waste oil Aboveground Storage Tank (AST), and a hydraulic oil AST. Rehrig plated and assembled approximately ¼ million shopping carts and baskets per year.

Three hazardous chemical storage areas were reportedly used at the site. Documents reviewed by TtEC provided conflicting information regarding the number of hazardous storage areas. This information is difficult to clarify as the Rehrig facility no longer exists and current Rehrig employees were unable to provide input during the November 29, 2006 site visit. Rehrig was a Large Quantity Generator (LQG) of hazardous waste.

The Rehrig facility provided treatment of the wastewater generated from the facility's nickel and chromium electroplating operations in an on-site wastewater treatment system. This wastewater treatment system included 4 stages of treatment in tanks, followed by waste treatment using a filter press to remove water from settled solids. Wastewater from the tanks and filter presses were discharged to the sanitary sewer system in accordance with a Pretreatment Permit issued and administered by the City of Richmond. This Permit was a requirement of the City's VPDES Municipal Wastewater Treatment Permit issued by the State Water Control Board and VDEQ.

The wastewater treatment sludge generated from the wastewater treatment system and filter presses was classified as a F006 listed waste code. The facility also generated acid waste and alkaline waste and these waste streams also carried the following characteristic waste codes; D002, D007, and D008.

A Compliance Order was issued by the Virginia Department of Health on December 26, 1984. The Virginia Department of Health found that Rehrig had not complied with financial requirements for hazardous waste management facilities in accordance with Virginia Hazardous Waste Management Regulations (VHWMR). Rehrig was required to provide documentation of compliance with these financial regulations by March 1, 1985.

A letter from the Virginia Department of Waste Management to Rehrig dated November 6, 1990 indicated that hazardous waste closure of the facility had been complete in accordance with the approved closure plan. It is not clear if this letter addressed all of the SWMUs.

A Virginia Waste Management Board Consent Order was issued on January 23, 1997 which described numerous violations observed during a July 11, 1996 VDEQ inspection. Violations included administrative items (manifest issues, no job titles for employees who manage hazardous waste, and failure to maintain tank assessment records) and physical violations (failure to keep all containers of hazardous waste closed, storage of incompatible materials, and improper secondary containment).

After several discussions between VDEQ and Rehrig, the facility entered into the January 1997 Order voluntarily. The Order indicated that violations were to be corrected in 90 days. A May 15, 1998 letter from VDEQ to Rehrig indicated that the facility met the terms of the Order and that the Order had been terminated.

In 2001, Rehrig pleaded guilty to criminal violations of the Clean Water Act and was ordered to pay \$500,000 for fines, implement pollution prevention improvements at its plant and perform a community service contribution.

Rehrig operated a wastewater treatment facility under a Pretreatment Permit issued by the City of Richmond; the wastewater discharge from this system was administered and regulated under the City's Municipal VPDES Permit. Rehrig admitted in its plea that in 1998, the company violated its permit numerous times by discharging excessive amounts of nickel and chromium (up to 30 times its permitted limits). The city issued Rehrig several citations, and in December 1998 found Rehrig in significant noncompliance with its permit. In early 1999, Rehrig agreed to improve its water treatment system.

According to a Water Tech Online internet article ([http://www.waternet.com/news.asp?mode=4&N\\_ID=23614](http://www.waternet.com/news.asp?mode=4&N_ID=23614)), Rehrig pleaded guilty to criminal violations of the Clean Water Act in June 2001 in US District Court here and was sentenced to pay \$500,000 for fines, pollution prevention improvements at its plant, and a community service contribution.

Just prior to this plea, a Rehrig employee was sentenced to six months of home confinement, with weekends in jail for 120 days, and ordered to pay a fine of \$7,500 after he pleaded guilty to a related Clean Water Act offense. He was also required to give three speeches on the importance of Clean Water Act compliance to industry managers.

Rehrig admitted that it violated its permit numerous times in 1998 by discharging excessive amounts of nickel and chromium. The City issued Rehrig several citations, and in December 1998 found Rehrig in significant noncompliance with its permit. In early 1999, Rehrig pledged to dedicate additional resources to wastewater treatment and promised to improve the supervision of its wastewater treatment operators.

However, Rehrig continued to periodically violate its permit, according to USEPA officials. At this time, Rehrig began moving its operations to a new site in neighboring Chesterfield County, Virginia.

On June 10, 1999, Rehrig discharged chromium into city sewers in amounts approximately 30 times the permit limits, and nickel in amounts six times the permit limits.

The company later acknowledged that this discharge occurred as the result of lack of staff resources, according to USEPA documents. In late September 1999, after additional permit violations by Rehrig and additional citations by the City of Richmond, Rehrig's discharges violated its permit on each of five consecutive days.

After Rehrig pleaded guilty to two criminal misdemeanors, the company was fined \$200,000, ordered to make a \$290,000 payment for adding pollution prevention/control equipment at its new plant (Chesterfield County facility), and ordered to make a \$10,000 contribution to the James River Advisory Council, a group formed to protect the river flowing through Richmond. Rehrig was also required to submit to the court an environmental compliance program, and its employees were required to perform 400 hours of community service.

Subsequently, Rehrig replaced its plating manager, plant manager, and vice president for production. Rehrig then contracted with an environmental consulting firm to perform wastewater treatment, and operated in compliance with its Chesterfield County Clean Water Act permit.

A September 23, 2003 Internal VDEQ Memorandum described an unannounced compliance inspection that was conducted on September 10, 2003. The Memorandum noted the site was turned over to Kroger, which planned to open a grocery store at the site in October 2003. The Memorandum requested the Office of Waste Programs to deactivate the VAD identification number, as Rehrig no longer occupied the site.

Photographs 1 through 5 found in Appendix A of this report show the condition of the site at the time of the September 29, 2006 Site Visit.

## **5.1 Area Geology and Hydrogeology**

### **Geology**

According to the 1989 Preliminary Assessment Report, the Rehrig facility is located in the Fall Zone between the Piedmont and Coastal Plain Physiographic Provinces. This is a transitional zone up to 10 miles wide where thin, younger Coastal Plain sediments begin to cover the Older Piedmont rocks.

The basement rock for this area is the Petersburg granite. In the Fall Zone, the Petersburg is overlain by Miocene marine transgressive sediments or younger Tertiary-Quaternary regressive sediments or both. Transgressive sediments are described as drab-gray, bluish-gray, and greenish-gray silts, clays, and silty clays commonly well consolidated with some plant fragments

and occasional shell beds. Regressive sediments are light to bright colored oxidized sediments, mainly sands and gravels with some clay.

Several borings (hand auger and test borings) were advanced in 1993 as part of an Environmental Site Assessment investigation. The following table summarizes the site-specific geology observed.

<b>Boring</b>	<b>Depth</b>	<b>Soil Description</b>
B-1	0 to 6 feet	Red-brown fat clay with sand fill, trace gravel, and brown fine to coarse poorly graded sand fill
	6 to 15 feet	Brown fine to medium sandy lean clay
B-2	0 to 6 feet	Brown and black fine to medium sandy lean clay fill, gravel, and asphalt
	6 to 15 feet	Brown, red, and gray fine sandy lean clay
HA-1	0 to 3.5 feet	Brown and red fine to coarse sandy lean clay fill with trace gravel
HA-2	0 to 1.5 feet	Gray crushed stone fill beneath concrete and red brown lean clay with trace sand
HA-3	0 to 1.5 feet	Gray crushed stone fill beneath concrete and yellow to brown fine to medium poorly graded sand, probable fill
HA-4	0 to 1 foot	Gray crushed stone fill beneath concrete and stone fill. Auger terminated due to second concrete slab
HA-5	0 to 1 foot	Brown lean clay with sand and red-brown fine to medium clayey sand
HA-6	0 to 1.2 feet	Red brown fine to medium clayey sand

## **Hydrology and Hydrogeology**

Groundwater quality within the Fall Zone is generally good except for some areas where high iron concentration poses a problem. According to the 1989 Preliminary Assessment, pumping rates up to 10 gallons per minute (gpm) are common with rates of 100 gpm possible. Most wells in the Fall Zone are drilled through the thin Coastal Plain deposits and are completed in the underlying bedrock.

No groundwater monitoring wells were known to be installed at the site; therefore site-specific information is not available.

## **5.2 Wastes Generated at the Facility**

The following waste streams were historically generated by Rehrig according to a November 17, 1998 VDEQ Survey Sheet for Inspection of Hazardous Waste Facilities:

- Sludge from nickel plating process (F006, D007)
- Waste acid (D002, D007)
- Waste alkaline (D002, D007, D008)

According to a 1997 Consent Order, the waste generated was stabilized waste sludge from the nickel trichrome plating process.

Muriatic acid with a pH of 1 to 2 (excluded from waste regulations) was treated neutralized and discharged to the sanitary sewer system under the facility's Pretreatment Permit issued by the City of Richmond.

The property is now the site of a Krogers grocery store and several small retail shops and generates no hazardous waste.

## **6.0 DESCRIPTION OF AOCS AND SWMUS**

### **6.1 SWMU #1 - Bays A1, A2, A3, A4, A5, A6, B1, B2, B3, B4, B5, B6, B7, and B8**

This unit received wastewater from the chrome plating operation and removed metals from the nickel chrome plating operation (pretreatment). The bays were located on the northwestern side of the building. The following summarizes the sizes and first dates of use of these bays:

<b>Bay Number</b>	<b>First Date of Use</b>	<b>Size (square feet)</b>
A1	July 1, 1979 - February 1, 1980	None provided
A2	February 1, 1980 - May 1, 1983	9,335
A3	May 1, 1982 - July 1, 1983	9,335
A4	July 1, 1983	8,840
A5	July 1, 1983	8,755
A6	July 1, 1983	8,840
B1	July 1, 1979 - February 1, 1980	Total of 41,444
B2	July 1, 1979 - February 1, 1980	
B3	July 1, 1979 - February 1, 1980	
B4	July 1, 1983	8,431
B5	July 1, 1983	8,431
B6	July 1, 1983	8,431
B7	July 1, 1983	8,323
B8	July 1, 1983	8,323

According to a letter from Rehrig to USEPA Region III dated May 20, 1986, this SWMU was a specially lined pit. The water was pumped from this unit through a series of lined tanks. The last tank had a baffle for collecting sludge. Following the last tank, water was then pumped through a filter press. The capacity of this unit was 30 gpm. The annual quantity of wastewater processed by this unit was estimated to be 650,000 (4.86 million gallons) cubic feet per year.

Pro Chem representatives indicated during the November 29, 2006 site visit that this SWMU was actually a group of fiberglass aboveground tanks/baths. The bay numbers are related to the plating lines from which the baths received liquid. A January 31, 1997 letter from CTI Consultants to Rehrig noted that five fiberglass tanks were visually examined and found to be in satisfactory condition and that they could be put into immediate service. A letter from VDEQ to Rehrig dated January 14, 1997 indicated that an epoxy-coated berm and leak detection systems were to be installed for these tanks. It is unclear if these five tanks were new at the time of the correspondence, or if they are included in the group of previously used tanks. A November 17, 1998 Hazardous Waste Management Compliance Inspection Report noted that these five tanks were of the following capacities:

- Two 3,300-gallon
- One 4,200-gallon
- Two 5,000-gallon

No closure plan was found in USEPA or VDEQ files, however, a letter from VDEQ to Rehrig dated March 24, 1989 indicated that a closure plan was submitted to the Virginia Department of Waste Management on February 28, 1989. The Virginia Department of Waste Management conducted a compliance inspection of the facility's operations on November 1, 1990 according to a November 6, 1990 letter to Rehrig. This letter provided the VDEQ's approval of closure of the hazardous waste management facility under Interim Status and documented that the facility was "closed" in accordance with the approved closure plan and the "certifications" of closure provided by Rehrig. This letter did not list specific SWMUs covered by this closure plan or the November 6, 1990 letter.

No evidence of a spill or release was found at the site visit or in the files reviewed at the VDEQ or USEPA Region III offices.

## **6.2 SWMU #2 - #1 and #2 Filter Press**

Rehrig operated two Filter Press units, each with a capacity of 1,500 pounds. According to files reviewed by TtEC, this equipment was active as of 1996. Pro Chem representatives reported during the November 29, 2006 site visit, that these filter presses were cleaned, dismantled, and sold for scrap.

No closure plan was found in USEPA or VDEQ files, however, a letter from VDEQ to Rehrig dated March 24, 1989 indicated that a closure plan was submitted to the Virginia Department of Waste Management on February 28, 1989. The Virginia Department of Waste Management conducted a compliance inspection of the facility's operations on November 1, 1990 according to a November 6, 1990 letter to Rehrig. This letter provided the VDEQ's approval of closure of the hazardous waste management facility under Interim Status and documented that the facility was "closed" in accordance with the approved closure plan and the "certifications" of closure provided by Rehrig. This letter did not list specific SWMUs covered by this closure plan or the November 6, 1990 letter.

No evidence of a spill or release was found at the site visit or in the files reviewed at the VDEQ or USEPA Region III offices.

### **6.3 SWMU #3 - Two Less Than 90-Day Accumulation Area**

Rehrig operated two less than 90-day accumulation areas that held the waste from the two Filter Press units (SWMU #2). According to files reviewed by TtEC, these units were active in 1996. The 1993 Environmental Site Assessment Update Report noted that there was only one hazardous waste storage area. No additional information was provided.

No closure plan was found in USEPA or VDEQ files, however, a letter from VDEQ to Rehrig dated March 24, 1989 indicated that a closure plan was submitted to the Virginia Department of Waste Management on February 28, 1989. The Virginia Department of Waste Management conducted a compliance inspection of the facility's operations on November 1, 1990 according to a November 6, 1990 letter to Rehrig. This letter provided the VDEQ's approval of closure of the hazardous waste management facility under Interim Status and documented that the facility was "closed" in accordance with the approved closure plan and the "certifications" of closure provided by Rehrig. This letter did not list specific SWMUs covered by this closure plan or the November 6, 1990 letter.

No evidence of a spill or release was found at the site visit or in the files reviewed at the VDEQ or USEPA Region III offices.

### **6.4 SWMU #4 - Drum Storage Area**

According to the 1989 Preliminary Assessment, this area was located near the loading dock. It was a concrete pad where full drums of dried nickel plating sludge, filter press cake, and metal chips scraped off metal parts holders were stored until they were removed from the site for disposal at a Treatment, Storage, Disposal Facility (TSDF). The concrete pad was fenced and secured with a lock at the time of the 1989 Preliminary Assessment. Approximately 80 drums were observed in this area during a March 16, 1989 RCRA inspection, which served as the last inspection prior the 1989 Preliminary Assessment being issued.

The 1989 Preliminary Assessment Report indicated that a closure plan was submitted to the Department of Waste Management. A letter from Rehrig to the Department of Waste Management dated October 19, 1990 provided certification statements for the closure of a containment slab. TtEC assumes that this letter refers to SWMU #4. Neither USEPA nor VDEQ files contained a closure plan for this unit.

No evidence of a spill or release was found at the site visit or in the files reviewed at the VDEQ or USEPA Region III offices.

### **6.5 SWMU #5 - Nickel Plating Sludge Drying Drum**

The 1989 Preliminary Assessment Report identified this unit as SWMU #1, which was located next to the nickel plating tank. As the nickel dropped out of the plating solution, it accumulated

on the bottom the tank as sludge. Once per week, the sludge was removed and placed in this drum to dry.

No closure plan was found in USEPA or VDEQ files, however, a letter from VDEQ to Rehrig dated March 24, 1989 indicated that a closure plan was submitted to the Virginia Department of Waste Management on February 28, 1989. The Virginia Department of Waste Management conducted a compliance inspection of the facility's operations on November 1, 1990 according to a November 6, 1990 letter to Rehrig. This letter provided the VDEQ's approval of closure of the hazardous waste management facility under Interim Status and documented that the facility was "closed" in accordance with the approved closure plan and the "certifications" of closure provided by Rehrig. This letter did not list specific SWMUs covered by this closure plan or the November 6, 1990 letter.

No evidence of a spill or release was found at the site visit or in the files reviewed at the VDEQ or USEPA Region III offices.

#### **6.6 SWMU #6 - Filter Press Cake Bin**

This SWMU is listed as SWMU #2 in the 1989 Preliminary Assessment Report. The Filter Press Cake Bin was located underneath the filter press at the end of the wastewater treatment process. It was a catch basin for the pressed filter cake that was generated by the filter press according to the 1989 Preliminary Assessment Report.

When the filter press reached its capacity, the filter press cake was removed by scraping it off the filters into a catch basin directly beneath the press. The cake was then stored in SWMU #3 prior to disposal.

No closure plan was found in USEPA or VDEQ files, however, a letter from VDEQ to Rehrig dated March 24, 1989 indicated that a closure plan was submitted to the Virginia Department of Waste Management on February 28, 1989. The Virginia Department of Waste Management conducted a compliance inspection of the facility's operations on November 1, 1990 according to a November 6, 1990 letter to Rehrig. This letter provided the VDEQ's approval of closure of the hazardous waste management facility under Interim Status and documented that the facility was "closed" in accordance with the approved closure plan and the "certifications" of closure provided by Rehrig. This letter did not list specific SWMUs covered by this closure plan or the November 6, 1990 letter.

No evidence of a spill or release was found at the site visit or in the files reviewed at the VDEQ or USEPA Region III offices.

#### **6.7 SWMU #7 - 55-Gallon Storage Drum**

According to the 1989 Preliminary Assessment Report, this SWMU (labeled as SWMU #3 in the 1989 Preliminary Assessment Report) was located near the filter press catch basin and contained nickel plating sludge, filter press cake, and any metal chips that were scraped off the metal parts holder. Layers of an absorbent material were also placed in this drum to prevent leaks.



No closure plan was found in USEPA or VDEQ files, however, a letter from VDEQ to Rehrig dated March 24, 1989 indicated that a closure plan was submitted to the Virginia Department of Waste Management on February 28, 1989. The Virginia Department of Waste Management conducted a compliance inspection of the facility's operations on November 1, 1990 according to a November 6, 1990 letter to Rehrig. This letter provided the VDEQ's approval of closure of the hazardous waste management facility under Interim Status and documented that the facility was "closed" in accordance with the approved closure plan and the "certifications" of closure provided by Rehrig. This letter did not list specific SWMUs covered by this closure plan or the November 6, 1990 letter.

No evidence of a spill or release was found at the site visit or in the files reviewed at the VDEQ or USEPA Region III offices.

#### **6.8 SWMU #8 - Wastewater Treatment System**

The wastewater from the plating process underwent four stages of treatment. In the first stage, wastewater pH was adjusted with lime to between 8.5 and 10. In the second stage, a flocculent was added, and in the third stage, a coagulating agent was added. The treated wastewater was then sent to a settling tank (partially below ground based on 1993 Environmental Site Assessment Update Report); it was then processed through a filter press to remove solids. Once treatment was complete, the water was discharged to the POTW through the City of Richmond sewer system.

No closure plan was found in USEPA or VDEQ files, however, a letter from VDEQ to Rehrig dated March 24, 1989 indicated that a closure plan was submitted to the Virginia Department of Waste Management on February 28, 1989. The Virginia Department of Waste Management conducted a compliance inspection of the facility's operations on November 1, 1990 according to a November 6, 1990 letter to Rehrig. This letter provided the VDEQ's approval of closure of the hazardous waste management facility under Interim Status and documented that the facility was "closed" in accordance with the approved closure plan and the "certifications" of closure provided by Rehrig. This letter did not list specific SWMUs covered by this closure plan or the November 6, 1990 letter.

No evidence of a spill or release was found at the site visit or in the files reviewed at the VDEQ or USEPA Region III offices.

#### **6.9 SWMU #9 - Interim Status Storage Unit**

On November 9, 1990, the Virginia Department of Waste Management provided the Rehrig facility with a copy of an October 15, 1990 Hazardous Waste Compliance Inspection. The Inspection Report indicated that the facility was in the process of closing an Interim Status Storage Unit. It is not clear if this SWMU is one of those described above.

No closure plan was found in USEPA or VDEQ files, however, a letter from VDEQ to Rehrig dated March 24, 1989 indicated that a closure plan was submitted to the Virginia Department of

Waste Management on February 28, 1989. The Virginia Department of Waste Management conducted a compliance inspection of the facility's operations on November 1, 1990 according to a November 6, 1990 letter to Rehrig. This letter provided the VDEQ's approval of closure of the hazardous waste management facility under Interim Status and documented that the facility was "closed" in accordance with the approved closure plan and the "certifications" of closure provided by Rehrig. This letter did not list specific SWMUs covered by this closure plan or the November 6, 1990 letter.

No evidence of a spill or release was found at the site visit or in the files reviewed at the VDEQ or USEPA Region III offices.

#### **6.10 AOC #1 - Hydraulic Oil-Contaminated Soil**

An April 26, 1993 Environmental Site Assessment Report prepared for Rehrig indicated that soil contaminated with hydraulic oil was removed in 1991. Approximately 2,336 cubic feet of soil was removed for offsite disposal. This contaminated soil was discovered during excavation activities taking place for an injection molding machine. Rehrig suspected that this contamination occurred prior to its occupation of the site. This incident was closed to the satisfaction of the State Water Control Board and the Richmond Fire Department.

No additional information was found in VDEQ or USEPA Region III files, or provided by facility representatives.

#### **6.11 AOC #2 - Sodium Hydrosulfite Reaction**

According to the 1993 Environmental Site Assessment Report, a chemical reaction occurred in December 1992. Sodium hydrosulfite, which was used in the wastewater treatment process (conducted indoors), was released to the concrete floor in the wastewater treatment process area. The material was swept up and placed in a 55-gallon drum. The drum contained some water, which reacted with the sodium hydrosulfite, resulting in smoke and fumes. No evidence was found in files reviewed indicating that the smoke or fumes left the building or site. The event was isolated to a 55-gallon drum trash container indoors. Oil dry was placed in the drum to stop the reaction. This incident was closed to the satisfaction of the State Water Control Board and the Richmond Fire Department.

No additional information was found in VDEQ or USEPA Region III files, or provided by facility representatives.

#### **6.12 AOC #3: - Former Diesel Fuel Underground Storage Tank**

A 1,000-gallon diesel fuel UST was removed from the site in April 1989 according to the 1993 Environmental Site Assessment Report. Soil samples collected during the removal activities contained low levels of petroleum hydrocarbon contamination. The levels were reported to be below the reportable level of 100 milligrams per kilograms (mg/kg) set by the State Water Control Board. No formal closure letter was issued by the State Water Control Board.

No additional information was found in VDEQ or USEPA Region III files, or provided by facility representatives.

## **7.0 DESCRIPTION OF EXPOSURE PATHWAYS FOR ALL RELEASES OR POTENTIAL RELEASES**

### **7.1 Air**

No information was found in USEPA or VDEQ files regarding air permits the facility historically maintained. No recorded or documented releases of contaminants to the environment nor odors at the Rehrig facility were identified in the documents reviewed, were confirmed by Pro Chem staff, or were noted during the site visit, except for the Sodium Hydrosulfite Reaction, which occurred in a drum indoors in December 1992. No evidence of complaints from residents or other surrounding properties was found in VDEQ or USEPA Region III offices. No evidence was found in files reviewed indicating that the smoke or fumes left the building or site. There is no hazard for a release of a hazardous waste to air as the site is now used for retail purposes.

The site is located in an urban commercial, industrial, and residential area. The closest residence is located approximately 500 feet away across Bowe Street to the northeast on West Leigh Street (Bowe Street bounds the Rehrig site to the southeast).

### **7.2 Surface Water**

The nearest surface water body is the James River, which is located approximately 1.6 miles south of the former Rehrig facility. According to the 1989 Preliminary Assessment Report, all plating tanks had concrete containment systems. Runoff was diverted to the City of Richmond's POTW via stormwater/sewer system; therefore it could not reach the James River.

No evidence of releases to the James River was found in files reviewed at VDEQ or USEPA Region III offices.

### **7.3 Groundwater**

According to the 1989 Preliminary Assessment Report, all plating tanks had concrete containment systems and that only runoff from the roof and sidewalks could reach groundwater via seepage; no processes took place outdoors. No groundwater wells were located within a three-mile radius of the site at the time of the 1989 Preliminary Assessment Report. No evidence of releases to groundwater was found in files reviewed at VDEQ or USEPA Region III offices.

No groundwater monitoring wells were known to be installed at the site, nor was groundwater encountered in soil borings (up to depth of 15 feet) or soil vapor points (no depth provided) advanced in 1993. Therefore, site-specific groundwater quality is not known.

## **7.4 Soil**

Areas around manufacturing units were reported to have been located on concrete with containment systems.

Soil samples were collected from the plating operation and analyzed for pH, sulfates, total chromium, hexavalent chromium, and nickel in 1989. According the 1989 Phase II Study (summarized in the 1993 Environmental Site Assessment Update Report; no evidence of significant leakage from the plating area was found. The 1993 Environmental Site Assessment Update Report indicated that low pH and elevated sulfate concentrations may have been the result of a minor sulfuric acid spill. No soil remediation took place as a result of the 1989 investigation.

Five soil vapor samples were collected from the vicinity of the UST in 1989; no soil samples were collected. Photoionization device (PID) values ranged from 0 to 2.6 parts per million (ppm). The 1989 Phase II Study found no evidence of hydrocarbons in the pit surrounding the UST.

The 1993 Environmental Site Assessment Update Report noted that hydraulic oil-contaminated soil was removed from the site. Rehrig suspected that this contamination occurred prior to its occupation of the site. This incident was closed to the satisfaction of the State Water Control Board and the Richmond Fire Department.

Soil samples collected in 1993 contained nickel concentrations ranging from 3.9 to 66.5 ppm and chromium concentrations ranging from 13.5 to 116.3 ppm. The 1993 Environmental Site Assessment Update Report indicated that these constituents could be naturally occurring. One soil sample collected from the vicinity of the diesel fuel UST contained 39 ppm of Total Petroleum Hydrocarbons (TPH), which was less than the reporting value of 100 ppm (per the State Water Board). No soil remediation took place as a result of the 1993 investigation.

## **8.0 EXPOSURE PATHWAY CONTROLS AND RELEASE CONTROLS INSTITUTED AT THE FACILITY**

### **8.1 Site Access**

The site is now occupied by a Krogers grocery store and small retail shops. Access to the site is provided via several public drive ways into the parking lot.

### **8.2 Air**

It is not clear if Rehrig maintained air permits for its operations. Raw hazardous chemicals and wastes are no longer stored at the facility; therefore there is no potential for a release to the atmosphere.

### **8.3 Surface Water**

No information found in VDEQ or USEPA files indicate that the site operated under a Virginia Pollution Discharge Elimination System (VPDES) permit. Stormwater was discharged from the site to the City of Richmond's stormwater sewer system. The facility maintained a wastewater Pretreatment Permit, which allowed the discharge of wastewater to the City's sanitary sewer system. Raw hazardous chemicals and wastes are no longer stored at the facility; therefore there is no potential for a release to the surface water.

### **8.4 Groundwater**

Potable water is supplied by the City of Richmond to the site and surrounding area (within a three miles radius according to the 1989 Preliminary Assessment Report). The source of the water is the James River; the intake was approximately three miles upstream and southwest of the site.

TtEC obtained a copy of City of Richmond Ordinance Division 4 – Water Service Connections, Pipes, and Meters – Section 106-336 – Duties of owners and tenants (provided in Appendix C of this report). This Ordinance indicates that all newly constructed or existing buildings shall be connected to the public water service system. It indicates that owners who have used another water supply system (for example, a well) that was installed and used prior to January 1, 1970 are not be required to have a public water connection if it can be proven that the alternative water supply is not detrimental to public health and safety, as approved by the Richmond City Health District. The ordinance also states that a property owner is able to drill a new potable well provided the Richmond City Health District approves the well and water quality.

TtEC contacted the Richmond City Health District for clarification of this ordinance. An environmental inspector indicated that 98 percent of the City of Richmond is served by municipal water (the vicinity of the site is included in this 98 percent) and that the District does not approve wells for potable use. The inspector reported that if there are any wells in the vicinity of the site, they are for irrigation purposes only.

The 1989 Preliminary Assessment Report indicated that groundwater contamination was not expected due to the plating tanks having concrete containment systems and the fact that all processes took place indoors.

### **8.5 Soil**

The former Rehrig facility was constructed with concrete floors and containment systems. If a release occurred, the material was removed from the containment structures and treated in the wastewater treatment system.

## **9.0 FOLLOW-UP ACTION ITEMS**

USEPA Region III will decide if additional information or sampling at the facility is required to determine whether the environmental indicators have been met or if corrective action is required by the facility.

The facility will determine if they would like to pursue RCRA Corrective Action utilizing the Facility Lead Program.

**APPENDIX A**  
**SITE VISIT PHOTOGRAPHS**



Photograph 1  
View of retail stores on the former Rehrig property.



Photograph 2  
View of Kroger Grocery Store on the former Rehrig property.





Photograph 3  
View of adjacent property.



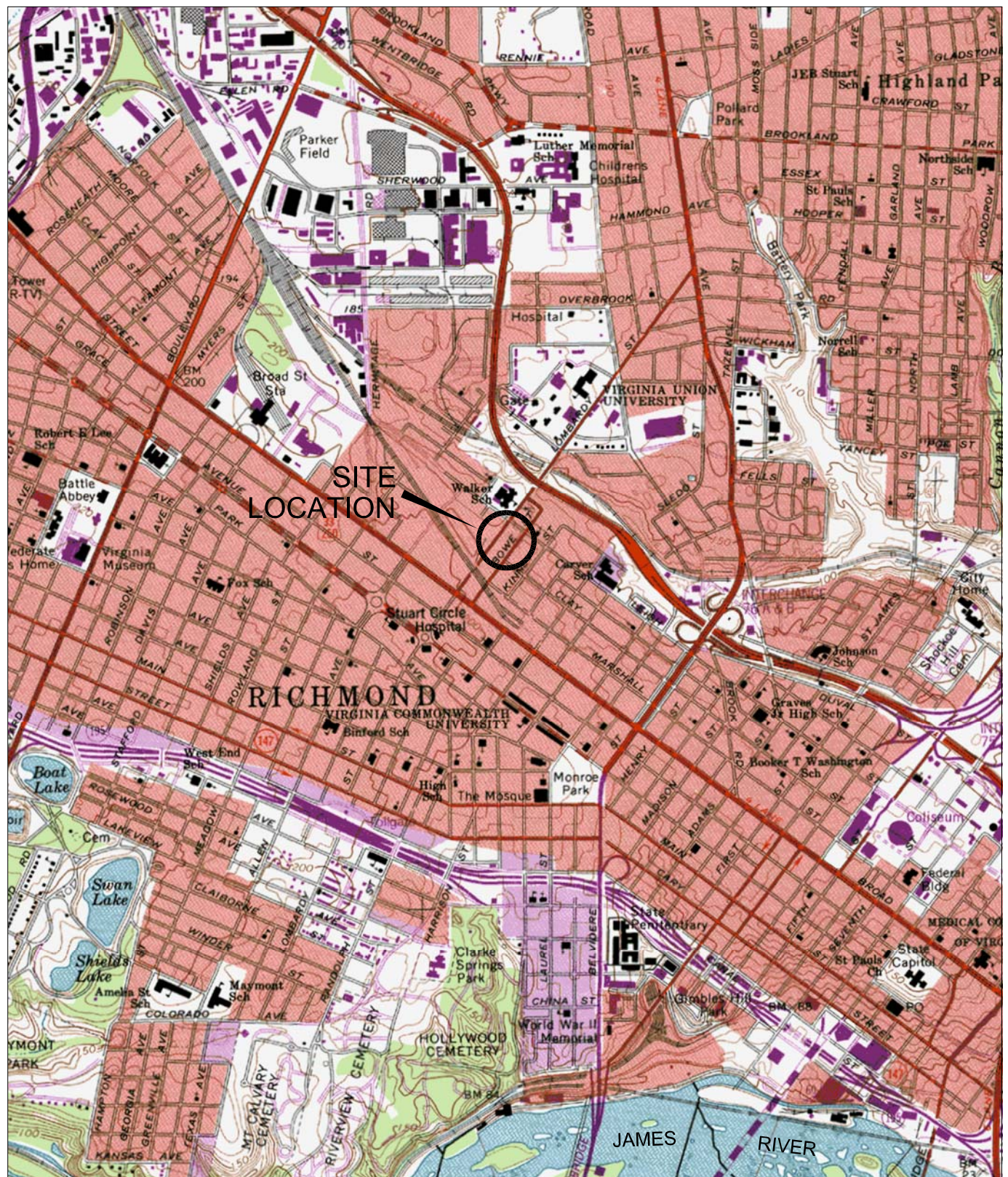
Photograph 4  
View of retail stores on the former Rehrig property.



Photograph 5  
View of Kroger Grocery Store on the former Rehrig property.

**APPENDIX B**  
**SITE LOCATION AND LAYOUT MAPS**





0 2000 4000 Feet

SOURCE: U.S.G.S. TOPOGRAPHIC MAP (7.5 Minute)  
RICHMOND, VIRGINIA.



United States Environmental  
Protection Agency

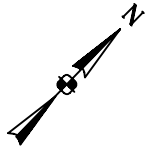
REHRIG  
Richmond, Virginia

FIGURE 1  
SITE LOCATION MAP



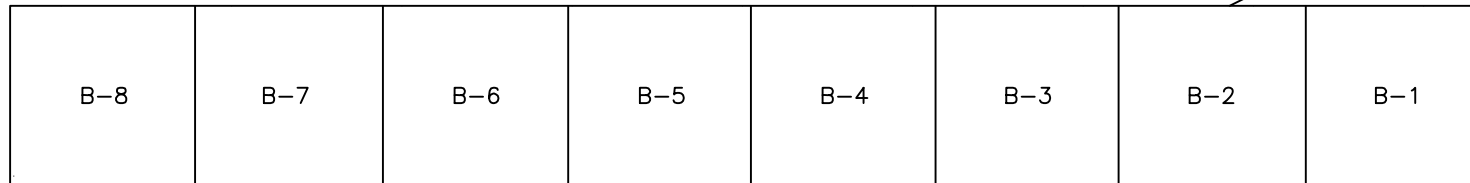
**TETRA TECH EC, INC.**





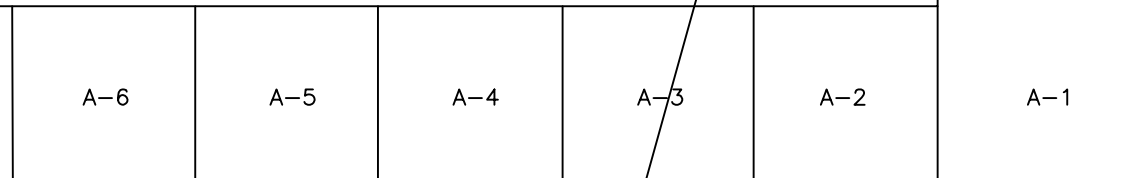
MAIN ENTRANCE (901 LOMBARDY ST.)

LOMBARDY STREET



COVERED LOADING

LEIGH STREET



BOWE STREET

DRUM STORAGE (20' x 30')

LEGEND:

NOT TO SCALE

SOURCE: EPA PERMIT APPLICATION, 11/18/80.

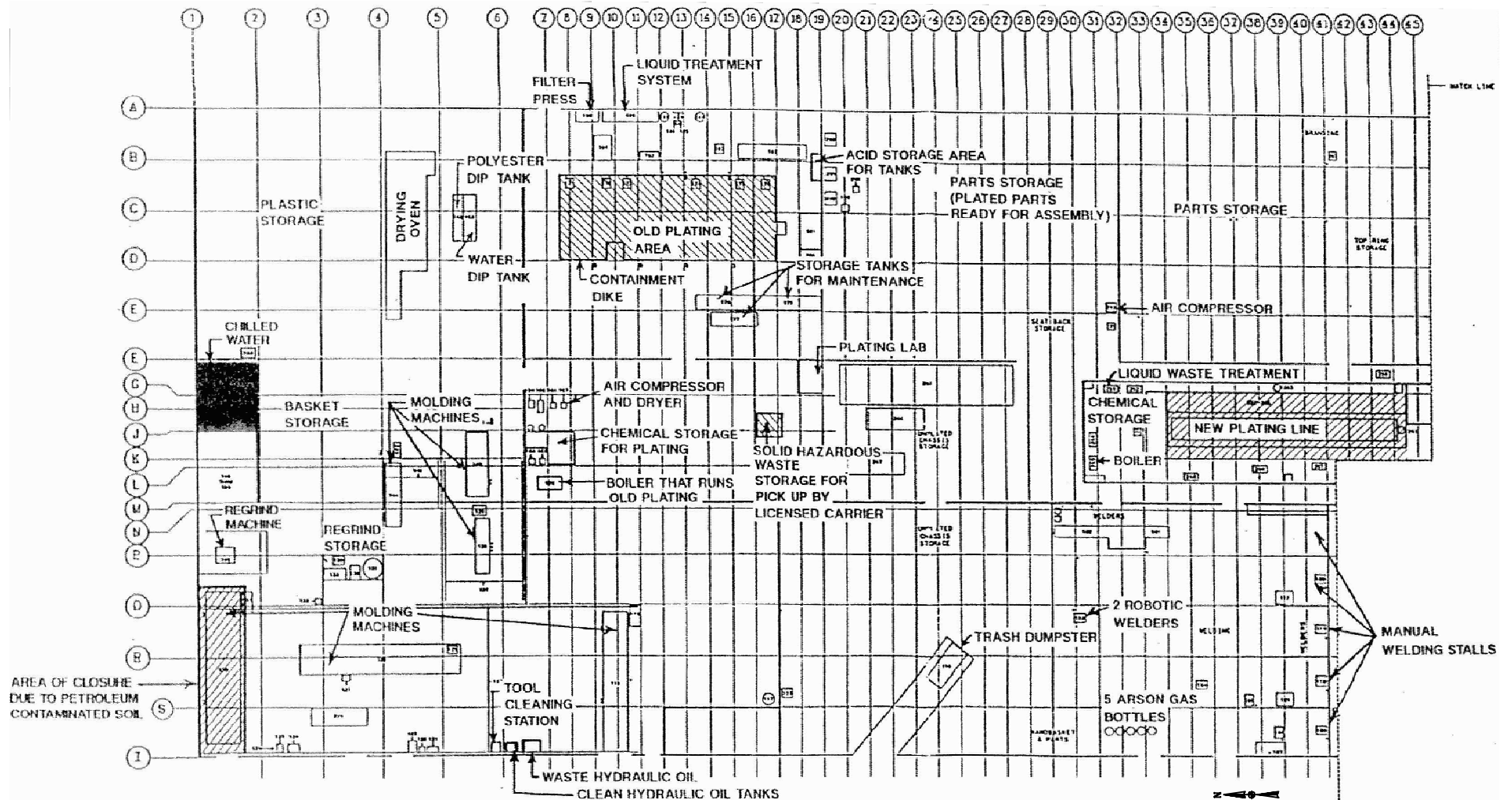
United States Environmental  
Protection Agency

REHRIG  
Richmond, Virginia

FIGURE 2  
SITE LAYOUT



**TETRA TECH EC, INC.**



NOT TO SCALE

United States Environmental  
Protection Agency

REHRIG  
Richmond, Virginia

FIGURE 3  
BUILDING LAYOUT (1 OF 2)

SOURCE: 1993 Environmental Site Assessment Update, Schnabel Environmental Services



**TETRA TECH EC, INC.**



## **APPENDIX C**

### **INVENTORY OF DOCUMENTATION AND REFERENCE DOCUMENTS**



## **Inventory of Documentation**

<b>November 14, 1980</b>	<b>Notification of Hazardous Waste Activity</b> Rehrig International gives written notification to the USEPA of Hazardous Waste Activity.
<b>November 19, 1980</b>	<b>USEPA forms completed by Rehrig International</b> General Information Form and Hazardous Waste Permit Application
<b>January 21, 1981</b>	<b>Letter from USEPA to Rehrig International</b> Acknowledgement by the USEPA that Rehrig International has applied for a hazardous waste permit.
<b>August 5, 1981</b>	<b>Letter from USEPA to H.B.P. Associates</b> Processing of the hazardous waste permit is complete.
<b>October 15, 1982</b>	<b>RCRA Inspection</b> On September 21, 1982 the Virginia State Health Department, Division of Solid and Hazardous Waste Management conducted an inspection that resulted in some violations.
<b>April 21, 1986</b>	<b>Letter from Rehrig International to USEPA</b> Correspondence concurring extension to provide information.
<b>May 20, 1986</b>	<b>Letter from Rehrig International to USEPA</b> Submittal of topographic map as well as history of the building, unit's function, and description of solid waste.
<b>July 1, 1986</b>	<b>Letter and Enclosure from Commonwealth of Virginia Department of Waste Management to Rehrig International</b> Inspection checklists
<b>July 26, 1986</b>	<b>Letter from Commonwealth of Virginia Department of Health to Rehrig International</b> Compliance Order outlining findings, orders and stipulations.
<b>July 30, 1986</b>	<b>RCRA Inspection</b> An RCRA inspection dated June 25, 1986 by Virginia's Department of Waste Management found areas of non-compliance.
<b>August 19, 1986</b>	<b>Internal Memo – US EPA Region III</b> Internal memo stating that action is going to be taken regarding violations found during inspections.

<b>October 8, 1986</b>	<b>RCRA Inspection</b> A re-inspection of the Rehrig facility on September 24, 1986 had made great improvements, but was still not in total compliance.
<b>October 16, 1986</b>	<b>Internal Memo – US EPA Region III</b> Internal memo stating that action is going to be taken regarding violations found during inspections.
<b>June 2, 1988</b>	<b>RCRA Inspection</b> After a RCRA inspection on December 8, 1987 the Rehrig facility was found to be in compliance with the Virginia Hazardous Waste Management Regulations.
<b>March 24, 1989</b>	<b>Letter from Virginia Department of Waste Management to Rehrig International</b> The closure plan for the Rehrig facility was received by the Virginia Department of Waste Management on February 28, 1989.
<b>August 2, 1989</b>	<b>Preliminary Assessment of Rehrig International</b> Preliminary Assessment of Rehrig International, prepared by Commonwealth of Virginia, Department of Waste Management.
<b>October 19, 1990</b>	<b>Letter from Rehrig International to Virginia Department of Waste Management</b> Certification statements and support documentation indicating clean closure of the facilities containment area has been achieved.
<b>November 6, 1990</b>	<b>Letter from Virginia Department of Waste Management to Rehrig International</b> November 1, 1990 the hazardous waste closure has been performed in accordance with the approved closure plan.
<b>November 9, 1990</b>	<b>RCRA Inspection</b> On October 15, 1990 an inspection showed that the facility was in compliance with the Virginia Hazardous Waste Management Regulations.
<b>April 1993</b>	<b>Report from Schnabel Environmental Services</b> Rehrig International ESA Update
<b>May 21, 1993</b>	<b>Letter from Virginia Department of Waste Management to Rehrig International</b> During an inspection on May 13, 1993 the Rehrig facility was found not to be in total compliance with the Virginia Hazardous Waste Management Regulations.

<b>July 16, 1993</b>	<b>Letter from Virginia Department of Waste Management to Rehrig International</b> A letter stating corrective actions taken to bring the plant in compliance with waste regulations.
<b>August 8, 1996</b>	<b>Letter from Virginia Department of Waste Management to Rehrig International</b> After a RCRA compliance inspection on July 11, 1996 the Rehrig facility was found to be not in compliance with waste management regulations.
<b>September 4, 1996</b>	<b>Letter from Rehrig International to VDEQ</b> A letter stating corrective actions taken to bring the plant in compliance with waste regulations.
<b>September 23, 1996</b>	<b>Letter from CTI Consultants, Inc. to Rehrig International</b> Proposal for visual inspection of fiberglass tanks.
<b>October 3, 1996</b>	<b>Letter from Commonwealth of Virginia Department of Environmental Quality to Rehrig International</b> RCRA Compliance Inspection, Rehrig International
<b>December 17, 1996</b>	<b>Virginia Waste Management Board Consent Order</b> Due to violations during RCRA inspections on July 11 and September 16, 1996 the Virginia Department of Environmental Quality, Piedmont Regional Office, has ordered a schedule of compliance as well as a fine.
<b>March 17, 1997</b>	<b>Letter from Virginia Department of Waste Management to Rehrig International</b> On March 6, 1997 another follow up inspection was done after much work was completed by Rehrig International to get the plant in compliance with the waste regulations.
<b>May 15, 1998</b>	<b>Letter from Virginia Department of Environmental Quality to Rehrig International</b> Letter states that all terms of the January 23, 1997 consent order with VDEQ have been met.
<b>November 25, 1998</b>	<b>Letter from Virginia Department of Waste Management to Rehrig International</b> Rehrig International was found, after a Hazardous Waste Management Compliance Inspection on November 17, 1998, to be in compliance with waste regulations.
<b>September 23, 2003</b>	<b>Internal Memorandum – Virginia Department of Environmental Quality</b> Internal memo stating that the facility is no longer active at this location.

**NOVEMBER 14, 1980**

**NOTIFICATION OF HAZARDOUS WASTE ACTIVITY**

ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITYINSTALLATION'S EPA  
I.D. NO.I. NAME OF IN-  
STALLATIONII. INSTALLATION  
MAILING  
ADDRESSIII. LOCATION  
OF INSTAL-  
LATIONRECEIVED  
RCRA SECTION  
EPA REGION III

Nov 1 4 00 00 1 229

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

## FOR OFFICIAL USE ONLY

## COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED  
(yr., mo., & day)

F VAD 08902837721

A

801114

I. NAME OF INSTALLATION

R E H R I G I N T

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3901 N. LOMBARDY ST.

CITY OR TOWN

4 R I C H M O N D

ST.

ZIP CODE

VA 23220

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5901 N. Lombardy St.

CITY OR TOWN

6 R I C H M O N D

ST.

ZIP CODE

VA 23220

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, &amp; job title)

PHONE NO. (area code &amp; no.)

2 PAUL BAUZ

804-355-7864

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 B. H. R E H R I G

B. TYPE OF OWNERSHIP  
(enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL  
M = NON-FEDERAL☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

# IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 6 23 - 26	2 F 0 0 7 23 - 26	3 F 0 0 8 23 - 26	4 F 0 0 9 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 23 - 26	32 23 - 26	33 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
---------------	---------------	---------------	---------------	---------------	---------------

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE  
(D001)

☐ 2. CORROSIVE  
(D002)

☒ 3. REACTIVE  
(D003)

☒ 4. TOXIC  
(D000)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

*Philip G. Howell*

NAME & OFFICIAL TITLE (type or print)

*Philip G. Howell* Vice Pres  
BEHRIG INTL

DATE SIGNED

Nov. 4, 1980

**NOVEMBER 19, 1980**

**USEPA FORMS COMPLETED BY REHRIG INTERNATIONAL**



<b>FORM 1</b> <b>GENERAL</b>		<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>GENERAL INFORMATION</b> <i>Consolidated Permits Program</i> (Read the "General Instructions" before starting.)		<b>I. EPA I.D. NUMBER</b> FVAD089028377	
<b>LABEL ITEMS</b>		<b>PLEASE PLACE LABEL IN THIS SPACE</b>  NOV 1 9 80 EPA REC-1231		<b>GENERAL INSTRUCTIONS</b>	
<b>I. EPA I.D. NUMBER</b>				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
<b>III. FACILITY NAME</b>					
<b>V. FACILITY MAILING ADDRESS</b>					
<b>VI. FACILITY LOCATION</b>					

**II. POLLUTANT CHARACTERISTICS**

**INSTRUCTIONS:** Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

**NAME OF FACILITY**

<b>SKIP</b>	REHRIG INTERNATIONAL, INC.
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**IV. FACILITY CONTACT**

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2	BAUZ, PAUL PLATING MANAGER	804	355 7864

**V. FACILITY MAILING ADDRESS**

A. STREET OR P.O. BOX			
3	901 N. LOMBARDY ST.		
B. CITY OR TOWN		C. STATE	D. ZIP CODE
4	RICHMOND	VA	23220

**VI. FACILITY LOCATION**

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER				
5	901 NORTH LOMBARDY ST.			
B. COUNTY NAME				
VA				
C. CITY OR TOWN		D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6	RICHMOND	VA	23220	



CONTINUED FROM THE FRONT

II. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
(specify)				(specify)			
C. THIRD				D. FOURTH			
(specify)				(specify)			

III. OPERATOR INFORMATION

A. NAME										B. Is the name listed in Item VIII-A also the owner?	
REHRIG INTERNATIONAL, INC.										<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)	
F = FEDERAL S = STATE P = PRIVATE M = PUBLIC (other than federal or state) O = OTHER (specify)										8 0 4 3 5 5 7 8 6 4	
E. STREET OR P.O. BOX											
901 NORTH LOMBARDY STREET											
F. CITY OR TOWN					G. STATE		H. ZIP CODE		IX. INDIAN LAND		
RICHMOND,					V A		23220		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)				D. PSD (Air Emissions from Proposed Sources)			
N				9 P			
B. UIC (Underground Injection of Fluids)				E. OTHER (specify)			
U				(specify)			
C. RCRA (Hazardous Wastes)				E. OTHER (specify)			
R				(specify)			

XI. MAP

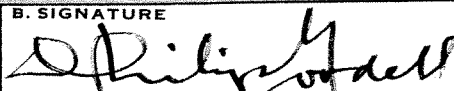
Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURE AND ASSEMBLY OF SHOPPING CARTS

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
PHILIP GOODELL, VICE PRESIDENT				11/11/80	

COMMENTS FOR OFFICIAL USE ONLY

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FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)		I. EPA I.D. NUMBER FVAD089028377	
<b>FOR OFFICIAL USE ONLY</b>					
APPLICATION APPROVED		DATE RECEIVED (yr., mo., & day)		COMMENTS	
23		24			
<b>II. FIRST OR REVISED APPLICATION</b>					
Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.					
<b>A. FIRST APPLICATION</b> (place an "X" below and provide the appropriate date)					
<input type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)			<input checked="" type="checkbox"/> 2. NEW FACILITY (Complete item below.)		
C 8 YR. MO. DAY 73 74 75 76 77 78			FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)		
15 73 74 75 76 77 78			8 6 0 8 25 73 74 75 76 77 78		
<b>B. REVISED APPLICATION</b> (place an "X" below and complete Item I above)					
<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS			<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT		
72			72		
<b>III. PROCESSES - CODES AND DESIGN CAPACITIES</b>					
<b>A. PROCESS CODE</b> - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).					
<b>B. PROCESS DESIGN CAPACITY</b> - For each code entered in column A enter the capacity of the process.					
<b>AMOUNT</b> - Enter the amount.					
<b>UNIT OF MEASURE</b> - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.					
PROCESS		PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	
Storage:				Treatment:	
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS		T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS		T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS		T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:				OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE		UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
TANKS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		
<b>EXAMPLE FOR COMPLETING ITEM III</b> (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.					
C D U P 1					
<b>B. PROCESS DESIGN CAPACITY</b>					
A. PROCESS CODE (from list above)		1. AMOUNT (specify)		2. UNIT OF MEASURE (enter code)	
X-1 S 0 2		600		G	
X-2 T 0 3		20		E	
1 S 0 1		5,000		G	
2					
3					
4					



**II. PROCESSES (continued)**

3. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

**A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS . . . . .	P
TONS . . . . .	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS . . . . .	K
METRIC TONS . . . . .	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO. /	A. EPA HAZARDOUS WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES							
							1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
X-1	K	0	5	4	900	P	T	0	3	D	8	0		
X-2	D	0	0	2	400	P	T	0	3	D	8	0		
X-3	D	0	0	1	100	P	T	0	3	D	8	0		
X-4	D	0	0	2										included with above

**NOTE:** Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																			
S													T/A	C	S													T/A	C			
W	V	A	D	0	8	9	0	2	8	3	7	7		1	W	DUP											2	DUP				
1	2											13	14	15	1	2											13	14	15	23	24	25

## IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

[illegible]

# IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

5	F	V	A	D	0	8	9	0	2	8	3	7	7	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

## V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

## VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

## VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, &amp; seconds)

3	7	4	0				
55	56	57	58	59	60	61	62

LONGITUDE (degrees, minutes, &amp; seconds)

7	7	2	0				
72	73	74	75	76	77	78	79

## VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

H.B.P. ASSOC.

MR. CHARLES SCHUMANN, General Partner

2. PHONE NO. (area code &amp; )

804 - 272 - 2111

3. STREET OR P.O. BOX

7737 Jahnke Rd.

4. CITY OR TOWN

Richmond,

5. ST.

VA

6. ZIP CODE

23225

## IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

H.B.P. Assoc.

B. SIGNATURE

Charles D. Schumann General Partner 4/23/81

C. DATE SIGNED

## X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

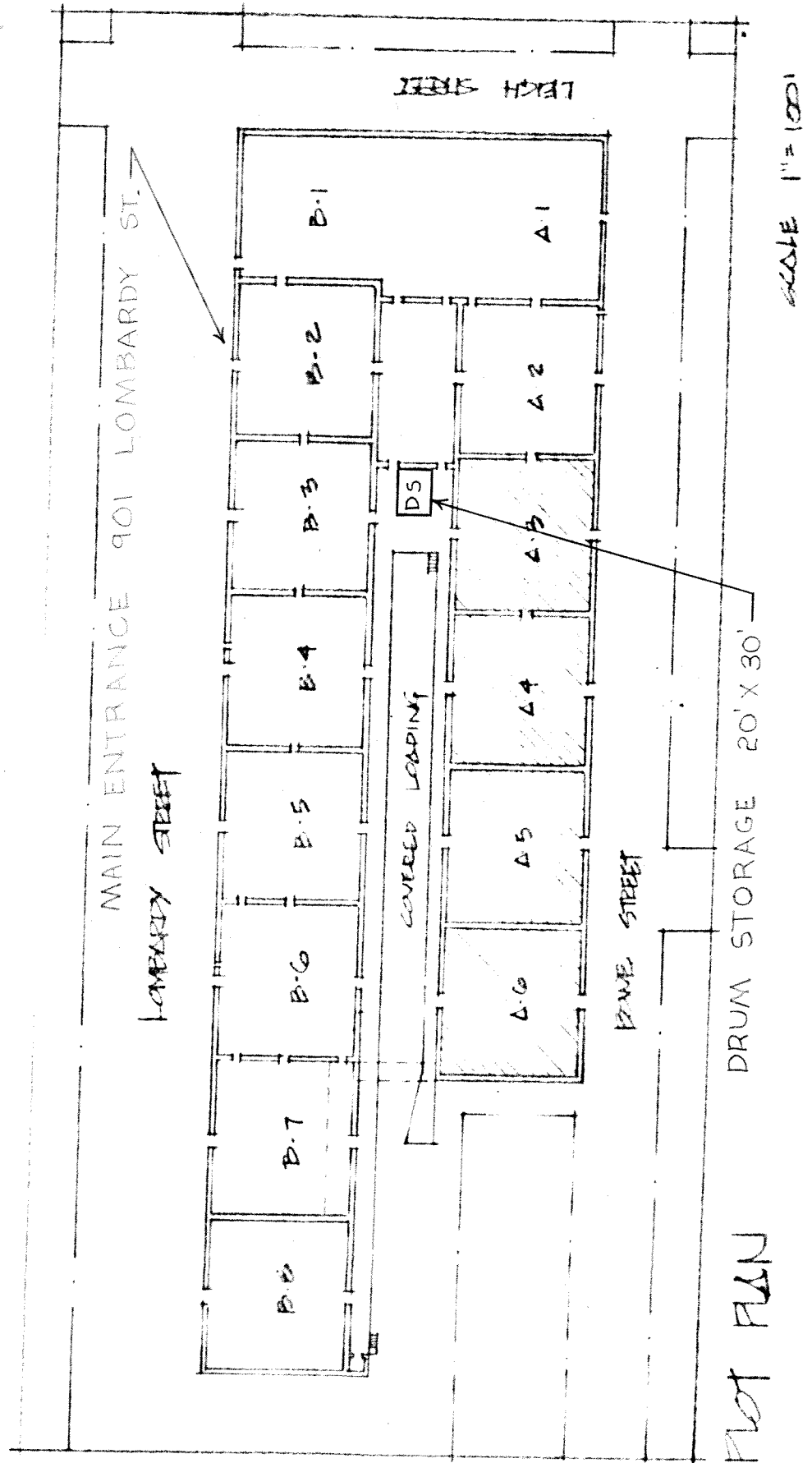
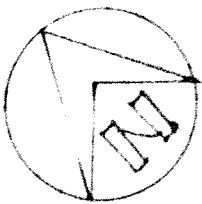
D. Philip Goodell

B. SIGNATURE

D. Philip Goodell

C. DATE SIGNED

11-11-80



**JANUARY 21, 1981**

**LETTER FROM USEPA TO REHRIG INTERNATIONAL**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III.

6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

EPA I.D. # VAD 08 902 8377

January 21, 1981

Mr. Paul Bauz  
Rehig International, Inc.  
901 North Lombardy Street  
Richmond, VA 23220

Re: Acknowledgment of Application for  
a Hazardous Waste Permit

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility located at the address shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.



**AUGUST 5, 1981**

**LETTER FROM USEPA TO H.B.P. ASSOCIATES**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III

6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

August 5, 1981

Mr. C. N. Schumann  
H. B. P. Associates  
7737 Jahnke Road  
Richmond, VA 23225

Dear Mr. Schumann:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

CONDITIONS OF OPERATION DURING  
INTERIM STATUS

Date Prepared: August 5, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

1. Facility name, location, and EPA Identification Number.

Name: Rehrig International Inc.

Location: 901 Lombardy Street  
Richmond, VA 23220

EPA I.D. No.: VAD 08 902 8377

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Mr. C. N. Schumann

H. B. P. Associates  
7737 Jahnke Road  
Richmond, VA 23225

Operator's Name: Mr. D. P. Goodell

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

<u>PROCESS</u>	<u>DESIGN CAPACITY</u>
S01	5,000 Gals.

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

<u>F006</u>	<u>F007</u>	<u>F008</u>	<u>F009</u>	

**OCTOBER 15, 1982**

**RCRA INSPECTION**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region III - 6th & Walnut Sts.  
Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection- Rehrig International  
VAD 089 028 377

DATE:

OCT 15 1982

Re: Harry J. Weber, Environmental Scientist  
Superfund/RCRA Compliance Section (3AW23) *HW*

FILE

Thru: ~~Walter~~ F. Lee, Chief  
Superfund/RCRA Compliance Section (3AW23)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS  
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION  
OF THESE VIOLATIONS.

CHECKLIST FOR RCRA INSPECTION OF GENERATORS

Name of Facility: Pering International Inc.

Address: 901 N. Lombardy St  
Richmond 23220

EPA Generator ID Number: VAD 089 028-377

Facility Inspection Representative: Paul Bang

Title: Plating Manager

Telephone Number: (804) 355-7864

RO USE

Inspection file

No. \_\_\_\_\_

Reviewer \_\_\_\_\_

Date reviewed: \_\_\_\_\_

Form "A" (VA)

VA HWM Regs.

1. Please provide a brief narrative explaining the type of work activity that occurs at the generator.

Manufacture of shopping  
carts and nickel-chrome  
plating of the carts.

2. Does the generator dispose of its wastes:

a) On-site?

(Circle one or both)

☒ b) Off-site?

Note: If on-site, then checklist for both a generator and TSD facility must be completed if on-site more than 90 days.

3. What is the amount (in kilograms) or number, as appropriate, of:

3.03.01

a) Hazardous waste produced per month by the generator facility? 1760 kilograms

3.03.02

b) Hazardous waste accumulated by the generator facility at any time?  
15,400 kilograms & 70 drums

3.03.03.(a,b)

c) Any commercial chemical product or manufacturing chemical intermediate having the generic name listed in 40 CFR Part 261.33(e) or any off-specification

commercial chemical product or manufacturing chemical intermediate which, if it met specifications, would have the generic name listed in 40 CFR Part 261.33(e) which is discarded each month or is accumulated at any time for discarding? 0 kilograms

3.03.03.(c)

d) Containers identified in 40 CFR Part 261.33(c) larger than 20 liters in capacity that are discarded each month or are accumulated at any time for discarding? 0 (number)

3.03.03(d)

e) Inner liners from containers identified under 40 CFR Part 261.33(c) that is discarded each month or is accumulated for discarding? 0 kilograms

3.03.03(e)

f) Any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill of any commercial chemical product or manufacturing chemical intermediate having the generic name listed in 40 CFR Part 261.33(e) that is discarded each month or is accumulated at any time for discarding? 0 kilograms

If the amount of (c) and (d) is less than 1, the amount of (e) is less than 10, the amount of (f) is less than 100, and the amount of (a) and (b) is less than 1000, then the facility qualifies as a small quantity generator and Form C should be completed instead of Form A.

4. What categories of hazardous wastes originate at the generator's facility? Please circle yes or no.

3.07

a) Ignitable wastes

Yes ☒ No

3.09

b) Reactive wastes

Yes ☒ No

3.08

c) Corrosive wastes

Yes ☒ No

3.10

d) EP Toxic wastes

Yes ☒ No

3.11

e) RCRA Listed Waste

☒ Yes No

5. Is the generator presently:

a) Treating hazardous waste?

☒ Yes No

b) Storing hazardous waste?

Yes No

c) Disposing hazardous waste?

Yes No

Note: if the generator performs any of the activities noted in Question #5 [except as provided for at 9.01(c)(7)], then the inspector must complete Form B, entitled "RCRA Checklist for inspection of hazardous waste treatment, storage and disposal facilities."

6.04

6. Is a manifest system currently in operation at the generator's facility so that off-site shipment of hazardous wastes can be tracked?

none sent off-site to date  
Yes No

7. Please inspect the generator's manifest for the following information:

5.04.03(c)

a) Is the TSD facility which receives a generator's hazardous waste identified by name, address, telephone number, and EPA ID number?

Yes No

5.04.02

b) Is a serialized manifest document number included on the form?

Yes No

5.04.03(a)

c) Are the generator's name, address, telephone number and EPA ID number included on the form?

Yes No

5.04.03(b)

d) Are the name, address, telephone number, and EPA identification number of each transporter included on the form?

Yes No

5.04.04

e) Is a description of the generator's hazardous waste to be treated, stored, or disposed included on the manifest?

Yes No

5.04.05

f) Are the quantity of each waste, by units of weight or volume, and the type and number of containers loaded in the transport vehicle included on the manifest form?

Yes No

5.04.06

g) Is the following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature?

"This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled



	and are in proper condition for transportation according to the available regulations of the DOT and EPA."	Yes	No
5.04.07	h) Are there adequate copies of the manifest available for generator, transporter, and TSD's?	Yes	No
6.05.05	8. Is hazardous waste being accumulated on-site by the generator for less than 90 days? If yes,	Yes	<input checked="" type="radio"/> No
6.05.05(a)(3)	a) Is the date accumulation of waste began clearly marked on each storage container?	Yes	No
6.05.05(a)(2)	b) Are storage containers in good condition, i.e., no corrosion, leaking, or structural deformations?	Yes	No
6.05.05(a)(4)	c) At the time of accumulation, are the storage containers clearly labeled as containing a particular hazardous waste in accordance with DOT regulations?	Yes	No
9.04.01(a)	9. Does the generator have an established contingency plan to deal with emergencies that may impact-hazardous waste currently in storage at the facility?	<i>hazardous waste is dry cake - can't spill</i> <i>is not flammable</i> Yes <input checked="" type="radio"/> No <input checked="" type="radio"/> <i>* see comment 1</i>	
9.02.07(a)	10. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?	Yes	<input checked="" type="radio"/> No <input checked="" type="radio"/>
9.02.07(d)(1)	11. Does the generator facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job?	Yes	<input checked="" type="radio"/> No <input checked="" type="radio"/>
9.02.07(d)(2)	12. Does the generator facility have on record a written position description for each job title noted in Question #11?	Yes	<input checked="" type="radio"/> No <input checked="" type="radio"/>
9.02.07(d)(3)	13. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #11?	Yes	<input checked="" type="radio"/> No <input checked="" type="radio"/>
9.03.02	14. *At the generator facility, is the following equipment installed:		
9.03.02(a)	a) An internal communications or alarm system capable of providing immediate		

- personnel if the hazardous waste storage area is threatened by fire or explosion? ☒ Yes No
- 9.03.02(b) b) A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.? ☒ Yes No
- 9.03.02(c,d) c) Fire control equipment and an adequate supply of fire fighting water or fire suppression chemicals? ☒ Yes No
- 9.03.05 15. \*Does the generator facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? ☒ Yes No
- 9.04 16. Does the facility have a contingency plan which contains the following elements: *does not have*
- 9.04.02(a,b) a) A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water? *N/A*  
Yes No
- 9.04.02(c) b) A detailed description of arrangements formally agreed to by local police, fire departments, and state and local emergency teams to provide assistance during emergency situations? Yes No
- 9.04.02(d) c) A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators? ☒ Yes No
- Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.
- 9.04.02(e) d) A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? Yes No
- 9.04.02(f) e) \*An evacuation plan for the generator facility if Management believes such a plan is a definite requirement for their particular generator facility. *not required*  
Yes No

17. Please provide detailed comments on specific problems encountered during the inspection. For instance, industry requests for clarification of specific RCRA rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.

\* There is no danger from this waste, in case of fire since it is dry, the material can't be spilled onto the water. The storage area is inside, and therefore can not be released into the air, water, or land.

Inspector's Name: Terrie Lynn Cross  
 Title: Public Health Engineer  
 Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Management  
 Office Location: 109 Governor Street, Richmond, VA 23219  
 Date of Inspection: Sept. 21, 1982

Inspector's Name: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Management  
 Office Location: 109 Governor Street, Richmond, VA 23219  
 Date of Inspection: \_\_\_\_\_

**CHECKLIST FOR RCRA INSPECTION OF TREATMENT,  
STORAGE & DISPOSAL (TSD) FACILITIES**

Name of Facility: Perrig International  
 Address: 901 N. Lombardy St.  
Richmond 23220  
 EPA ID Number: YAD 089 028 377  
 Facility Inspection Representative: Paul Bang  
 Title: Plating Manager  
 Telephone: (804) 355-7864

RO USE

Inspection File  
 No. \_\_\_\_\_  
 Reviewer \_\_\_\_\_  
 Date reviewed \_\_\_\_\_  
 Form "B" (VA)

**SITE CHARACTERIZATION** (Please denote if the facility presently treats, stores, or disposes of hazardous waste. Also, mark the appropriate sub-category that occurs at the particular facility.)

**TREATER**

☐ Filtration  
☐ Incineration  
☐ Thermal Reduction  
☐ Recycling/Recovery  
☐ Chem/Phys/Bio Treatments  
☐ Reprocessing  
☐ Solvent Recovery  
☐ Other \_\_\_\_\_

**STORER**

☐ Open Pile  
☐ Surface Impoundment  
☒ Drum  
☐ Above ground tank(s)  
☐ Below ground tank(s)  
☐ Other \_\_\_\_\_

**DISPOSER**

☐ Landfill operation  
☐ Land treatment  
☐ Surface Impoundment  
☐ Incineration  
☐ Other \_\_\_\_\_

VA HWM Regs.

**INSPECTION PROCEDURE**

- |            |  |                                      |                                     |
|------------|--|--------------------------------------|-------------------------------------|
|            | 1. Does the facility generate hazardous wastes?  | <input checked="" type="radio"/> Yes | <input type="radio"/> No            |
|            | Note: Please complete the generator's checklist if TSD facility generates hazardous wastes which are disposed of off-site. |                                      |                                     |
| 9.02.03(a) | 2. Does the facility receive hazardous waste from a foreign source?  | Yes                                  | <input checked="" type="radio"/> No |
|            | If yes, has the facility notified the Commissioner of the date of arrival?   | Yes                                  | No                                  |
| 9.02.04(a) | 3. For on-site tsd, does the facility have a sufficient waste analysis?  | <input checked="" type="radio"/> Yes | No                                  |
| 9.02.04    | 4. For off-site, does the facility have in place a waste analysis plan? If so,   | Yes                                  | No                                  |

- |                   |  |                                      |  |
|-------------------|--|--------------------------------------|--|
| 9.02.04(a)(1)     | a) Does the plan enable facility personnel to identify hazardous wastes being handled by the facility?   | Yes                                  | No   |
| 9.02.04(b)(3)     | b) Does the plan enable facility personnel to confirm that wastes actually received at the TSD facility are the wastes indicated on the generator's manifest form?   | Yes                                  | No   |
| 9.02.05(b)(1)     | 5. *Does the TSD facility have a 24-hour surveillance system which monitors and controls entry to the active portion of the facility, including:   | <input checked="" type="radio"/> Yes | No   |
| 9.02.05(b)(2)(i)  | a) an artificial or natural boundary which surrounds active portions of the facility and,  | <input checked="" type="radio"/> Yes | No <i>all inside</i>   |
| 9.02.05(b)(2)(ii) | b) A means to control entry at all times, i.e., gates, attendants, locked entrances, etc.?   | <input checked="" type="radio"/> Yes | No   |
| 9.02.05(c)        | 6. *Does the TSD facility have a restricted access sign posted at each entrance to the active portion of the facility? (an example would be: "Danger - Unauthorized Personnel Keep Out!") If so,   | Yes                                  | <input checked="" type="radio"/> No  |
|                   | a) Is the sign legible from a distance of 25 feet?   | Yes                                  | No   |
|                   | b) Is the sign in English or any other foreign language predominant to the geographical area?  | Yes                                  | No   |
| 9.02.06(b)(1)     | 7. Does the TSD facility have a written schedule for inspecting all emergency equipment, security devices, and operating and structural equipment, important to the prevention, detection or response to environmental/human health emergencies? | Yes                                  | No <i>not written, but inspected daily - usually on the hour</i> <input checked="" type="radio"/> No ✓ |
| 9.02.06(d)        | 8. Does the facility have an inspection log for the items in question #7 that includes the date, time of inspection, observations made, and inspector's initials?  | Yes                                  | <input checked="" type="radio"/> No ✓  |
| 9.02.07(d)(1)     | 9. Does the TSD facility maintain a record of job titles for personnel that are involved with hazardous waste management?  | Yes                                  | <input checked="" type="radio"/> No ✓  |

- |               |  |                                      |                                     |
|---------------|--|--------------------------------------|-------------------------------------|
| 9.02.07(d)(1) | 10. Does the TSD facility have the name of the employee filling each position in hazardous waste management?   | Yes                                  | <input checked="" type="radio"/> No |
| 9.02.07(d)(2) | 11. Does the TSD facility have on record a written position description of each job title noted in Question #9?  | Yes                                  | <input checked="" type="radio"/> No |
| 9.02.07(a)    | 12. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?  | Yes                                  | <input checked="" type="radio"/> No |
| 9.02.07(d)(3) | 13. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #7?  | Yes                                  | <input checked="" type="radio"/> No |
| 9.02.07(d)(4) | 14. Does the facility have records to document this training?  | Yes                                  | <input checked="" type="radio"/> No |
| 9.03.02       | 15. *At the TSD facility, is the following equipment installed:  |                                      |                                     |
| 9.03.02(a)    | a) An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion?  | <input checked="" type="radio"/> Yes | No                                  |
| 9.03.02(b)    | b) A device at the scene of hazardous waste TSD operations capable of summoning emergency assistance from Police, Fire departments, etc.?  | <input checked="" type="radio"/> Yes | No                                  |
| 9.03.02(c,d)  | c) Fire control equipment and an adequate supply of fire fighting water or fire suppression chemicals?   | <input checked="" type="radio"/> Yes | No                                  |
| 9.04          | 16. Does the facility have a contingency plan which contains the following elements:   |                                      | <i>* see comment</i>                |
| 9.04.02(a)    | a) A detailed description of emergency procedures which facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water?   | Yes                                  | No                                  |
| 9.04.02(c)    | b) A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations? (if such arrangements are refused, documentation of the refusal is sufficient). | Yes                                  | No                                  |

9.04.02(d)

- c) A listing of names, addresses, and phone numbers of the TSD facility emergency response coordinators?

Yes No

Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.

9.04.02(e)

- d) A list of appropriate emergency equipment necessary to cope with emergencies at the TSD facility?

Yes No

9.04.02(f)

- e) \*An evacuation plan for the TSD facility if Management believes such a plan is a definite requirement for their particular TSD facility?

Yes No

9.04.03

- f) Are copies of the plan sent to the local police and fire departments, hospital, and emergency rescue team?

Yes No

9.04.05

17. Does the facility have at all times at least one employee either on-call or on the site who is responsible for coordinating all emergency response measures?

Yes No

If so, please complete below:

Name: Paul Bang

Title: Planting Manager

Telephone Number: \_\_\_\_\_

9.04.08(a)

18. Does the TSD facility have a written operating record which contains the following information:

9.04.08(b)(1)

- a) A description of and the quantity of each hazardous waste received, and the method and date of treatment, storage or disposal? (Required if off-site generation)

N/A  
Yes No

9.04.08(b)(2)

- b) The location of each hazardous waste within the facility and the quantity at each location?

(Yes) No

9.04.08(b)(3)

- c) Detailed records and results of waste analyses and incineration trial tests performed on wastes coming into the facility? (Required if off-site generation)

(Yes) No

9.04.08(b)(4)	d) Detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan?	N/A	Yes	No
9.04.08(b)(5)	e) Detailed records and results of inspections performed on facility emergency equipment, TSD systems, and hazardous waste areas?		Yes	No <input checked="" type="checkbox"/>
9.04.08(b)(6)	f) Detailed monitoring, testing, and analytical data where required?		<input checked="" type="checkbox"/> Yes	No
9.06.03	19. Have the TSD facility operators prepared written closure plans?		Yes	No <input checked="" type="checkbox"/>
9.06.08	20. Have the TSD facility operators prepared written post closure plans?	N/A	Yes	No
9.04.07	21. Does the TSD facility receive hazardous waste from off-site generators? If yes, are the following procedures implemented:		Yes	No <input checked="" type="checkbox"/>
5.05	a) Manifest copies are signed and dated		Yes	No
5.05.03	b) A copy is given to the transporter		Yes	No
5.05.04	c) A copy is sent to the generator		Yes	No
5.05.05	d) A copy is returned and filed at the TSD facility		Yes	No
9.05	22. Does the facility owner utilize surface impoundments, landfills or land treatment technologies?		Yes	No <input checked="" type="checkbox"/>
9.05	23. If yes, has the owner implemented a groundwater monitoring program?		Yes	No
	24. Has an annual report been filed?		<input checked="" type="checkbox"/> Yes	No

given to me

MUST BE OBSERVED

9.02.08(a)	a) Open fires	Yes	No <input checked="" type="checkbox"/>
9.02.08(b)(2,3)	b) Fumes or gases	Yes	No <input checked="" type="checkbox"/>
9.02.08(b)(4)	c) Leaks or corrosion in containers or other storage structures	Yes	No <input checked="" type="checkbox"/>
9.08.02			



- |               |  |                                      |                                     |
|---------------|--|--------------------------------------|-------------------------------------|
| 9.02.08(b)(5) | d) Leachate to receiving streams   | Yes                                  | No <i>N/A</i>                       |
| 9.03.01       | e) Malfunction of equipment  | Yes                                  | <input checked="" type="radio"/> No |
| 9.03.01       | f) Bulging drums   | Yes                                  | <input checked="" type="radio"/> No |
| 9.08.02       |  |                                      |                                     |
| 9.02.08(b)(1) | g) Excessive heat generation from storage facilities, lagoons, storage piles, etc.   | Yes                                  | <input checked="" type="radio"/> No |
| 9.03.05       | 26. *Does the TSD facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? | <input checked="" type="radio"/> Yes | No                                  |

27. Please provide detailed comments on specific problems encountered during the TSD facility inspection. For instance, industry requests for clarification of specific rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.

Comment #1 - There is no danger from this waste in case of fire. Since it is dry, the material can't be spilled onto the water. The storage area is inside, and therefore can not be released into the air, water, or land.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Inspector's Name: Louis Lynn Cross

Title: Public Health Engineer

Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Mgt.

Office Location: 109 Governor Street, Richmond, VA 23219

Date of Inspection: Sept. 21, 1982

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Mgt.

Office Location: 109 Governor Street, Richmond, VA 23219

Date of Inspection: \_\_\_\_\_

**CHECKLIST FOR RCRA INSPECTION OF USE  
AND MANAGEMENT OF CONTAINERS**

RO USE

Name of Facility: Lehrig International

Inspection file

Address: 901 N. Lombardy St.

No. \_\_\_\_\_

Richmond, Va. 23220

Reviewer \_\_\_\_\_

EPA Generator ID Number: VAD 089 028 377

Date reviewed \_\_\_\_\_

Facility Inspection Representative: Paul Baum

Form "I" (VA)

Title: Planting Manager

Telephone Number: (804) 355-7864

The questions contained in this checklist apply to owners and operators of all hazardous waste facilities that store containers of hazardous waste, except as Section 9.01 provides otherwise.

**Va. HWM Regs.**

9.08.02

1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?

☒ Yes ☐ No

9.08.03

2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes?

☒ Yes ☐ No

9.08.04(a)

3. Are all containers holding hazardous waste kept closed during storage?

☒ Yes ☐ No

9.08.05

4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week?

☒ Yes ☐ No

9.02.06(b)(1)

5. Is an inspection log maintained? (See question #5 of TSD checklist.)

9.02.06(d)

Yes ☒ No

9.08.06

6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?

N/A  
Yes ☐ No ☐

9.08.07(a)

7. Are incompatible wastes placed in the same container? (See Appendix 5 for examples.)

N/A  
Yes ☐ No ☐

9.08.07(c)

8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices?

N/A  
Yes ☐ No ☐

Inspector's Name: Terri Lynn Cross

Title: Public Health Engineer

Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Management

Office Location: 109 Governor Street, Richmond, VA 23219

Date of Inspection: Sept. 21, 1982

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Management

Office Location: 109 Governor Street, Richmond, VA 23219

Date of Inspection: \_\_\_\_\_

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.

Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection- Rehrig International  
VAD 089 028 377

DATE:

OCT 15 1982

FROM: Harry J. Weber, Environmental Scientist  
Superfund/RCRA Compliance Section (3AW23) *HJW*

FILE

Thru: ~~Walter F. Lee~~, Chief  
Superfund/RCRA Compliance Section (3AW23)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS  
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION  
OF THESE VIOLATIONS.

CHECKLIST FOR RCRA INSPECTION OF GENERATORS

Name of Facility: Perrig International Inc.

Address: 901 N. Lombardy St  
Richmond 23220

EPA Generator ID Number: VAD 089 028-377

Facility Inspection Representative: Paul Baug

Title: Plating Manager

Telephone Number: (804) 355-7864

RO USE

Inspection file

No. \_\_\_\_\_

Reviewer \_\_\_\_\_

Date reviewed: \_\_\_\_\_

Form "A" (VA)

VA HWM Regs.

1. Please provide a brief narrative explaining the type of work activity that occurs at the generator.

Manufacture of shopping  
carts and nickel-chrome  
plating of the carts.

2. Does the generator dispose of its wastes:

a) On-site?

(Circle one or both)

☒ b) Off-site?

Note: If on-site, then checklist for both a generator and TSD facility must be completed if on-site more than 90 days.

3. What is the amount (in kilograms) or number, as appropriate, of:

3.03.01

a) Hazardous waste produced per month by the generator facility? 1760 kilograms

3.03.02

b) Hazardous waste accumulated by the generator facility at any time?  
15,400 kilograms ~70 drums

3.03.03.(a,b)

c) Any commercial chemical product or manufacturing chemical intermediate having the generic name listed in 40 CFR Part 261.33(e) or any off-specification

commercial chemical product or manufacturing chemical intermediate which, if it met specifications, would have the generic name listed in 40 CFR Part 261.33(e) which is discarded each month or is accumulated at any time for discarding? 0 kilograms

3.03.03.(c)

d) Containers identified in 40 CFR Part 261.33(c) larger than 20 liters in capacity that are discarded each month or are accumulated at any time for discarding? 0 (number)

3.03.03(d)

e) Inner liners from containers identified under 40 CFR Part 261.33(c) that is discarded each month or is accumulated for discarding? 0 kilograms

3.03.03(e)

f) Any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill of any commercial chemical product or manufacturing chemical intermediate having the generic name listed in 40 CFR Part 261.33(e) that is discarded each month or is accumulated at any time for discarding? 0 kilograms

If the amount of (c) and (d) is less than 1, the amount of (e) is less than 10, the amount of (f) is less than 100, and the amount of (a) and (b) is less than 1000, then the facility qualifies as a small quantity generator and Form C should be completed instead of Form A.

4. What categories of hazardous wastes originate at the generator's facility? Please circle yes or no.

3.07

a) Ignitable wastes

Yes ☒ No

3.09

b) Reactive wastes

Yes ☒ No

3.08

c) Corrosive wastes

Yes ☒ No

3.10

d) EP Toxic wastes

Yes ☒ No

3.11

e) RCRA Listed Waste

☒ Yes No

5. Is the generator presently:

a) Treating hazardous waste?

☒ Yes No

b) Storing hazardous waste?

Yes No

c) Disposing hazardous waste?

Yes No

Note: if the generator performs any of the activities noted in Question #5 [except as provided for at 9.01(c)(7)], then the inspector must complete Form B, entitled "RCRA Checklist for inspection of hazardous waste treatment, storage and disposal facilities."

6.04

6. Is a manifest system currently in operation at the generator's facility so that off-site shipment of hazardous wastes can be tracked?

*name sent off-site to date*  
Yes No

7. Please inspect the generator's manifest for the following information:

5.04.03(c)

a) Is the TSD facility which receives a generator's hazardous waste identified by name, address, telephone number, and EPA ID number?

Yes No

5.04.02

b) Is a serialized manifest document number included on the form?

Yes No

5.04.03(a)

c) Are the generator's name, address, telephone number and EPA ID number included on the form?

Yes No

5.04.03(b)

d) Are the name, address, telephone number, and EPA identification number of each transporter included on the form?

Yes No

5.04.04

e) Is a description of the generator's hazardous waste to be treated, stored, or disposed included on the manifest?

Yes No

5.04.05

f) Are the quantity of each waste, by units of weight or volume, and the type and number of containers loaded in the transport vehicle included on the manifest form?

Yes No

5.04.06

g) Is the following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature?

"This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled



	and are in proper condition for transportation according to the available regulations of the DOT and EPA."	Yes	No
5.04.07	h) Are there adequate copies of the manifest available for generator, transporter, and TSD's?	Yes	No
6.05.05	8. Is hazardous waste being accumulated on-site by the generator for less than 90 days? If yes,	Yes	<u>No</u>
6.05.05(a)(3)	a) Is the date accumulation of waste began clearly marked on each storage container?	Yes	No
6.05.05(a)(2)	b) Are storage containers in good condition, i.e., no corrosion, leaking, or structural deformations?	Yes	No
6.05.05(a)(4)	c) At the time of accumulation, are the storage containers clearly labeled as containing a particular hazardous waste in accordance with DOT regulations?	Yes	No
9.04.01(a)	9. Does the generator have an established contingency plan to deal with emergencies that may impact hazardous waste currently in storage at the facility?	<i>hazardous waste is dry cake - can't spill</i> <i>is not flammable</i> Yes <u>No</u> <i>X see comment 1</i>	
9.02.07(a)	10. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?	Yes	<u>No</u> ✓
9.02.07(d)(1)	11. Does the generator facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job?	Yes	<u>No</u> ✓
9.02.07(d)(2)	12. Does the generator facility have on record a written position description for each job title noted in Question #11?	Yes	<u>No</u> ✓
9.02.07(d)(3)	13. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #11?	Yes	<u>No</u> ✓
9.03.02	14. *At the generator facility, is the following equipment installed:		
9.03.02(a)	a) An internal communications or alarm system capable of providing immediate		

9.03.02(b) personnel if the hazardous waste storage area is threatened by fire or explosion? ☒ Yes No

9.03.02(b) b) A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.? ☒ Yes No

9.03.02(c,d) c) Fire control equipment and an adequate supply of fire fighting water or fire suppression chemicals? ☒ Yes No

9.03.05 15. \*Does the generator facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? ☒ Yes No

9.04 16. Does the facility have a contingency plan which contains the following elements: *does not have*

9.04.02(a,b) a) A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water? *N/A*  
☒ Yes No

9.04.02(c) b) A detailed description of arrangements formally agreed to by local police, fire departments, and state and local emergency teams to provide assistance during emergency situations? ☒ Yes No

9.04.02(d) c) A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators? ☒ Yes No

Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.

9.04.02(e) d) A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? ☒ Yes No

9.04.02(f) e) \*An evacuation plan for the generator facility if Management believes such a plan is a definite requirement for their particular generator facility. *not required*  
☒ Yes No

17. Please provide detailed comments on specific problems encountered during the inspection. For instance, industry requests for clarification of specific RCRA rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.

\* There is no danger from this waste, in case of fire since it is dry, the material can't be spilled onto the water. The storage area is inside, and therefore can not be released into the air, water, or land.

Inspector's Name: Terrie Lynn Cross  
 Title: Public Health Engineer  
 Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Management  
 Office Location: 109 Governor Street, Richmond, VA 23219  
 Date of Inspection: Sept. 21, 1982

Inspector's Name: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Management  
 Office Location: 109 Governor Street, Richmond, VA 23219  
 Date of Inspection: \_\_\_\_\_

**CHECKLIST FOR RCRA INSPECTION OF TREATMENT,  
STORAGE & DISPOSAL (TSD) FACILITIES**

Name of Facility: Rennig International  
 Address: 901 N. Lombardy St.  
Richmond 23220  
 EPA ID Number: YAD 089 028 377  
 Facility Inspection Representative: Paul Bang  
 Title: Plating Manager  
 Telephone: (804) 355-7864

NO USE

Inspection File

No. \_\_\_\_\_

Reviewer \_\_\_\_\_

Date reviewed \_\_\_\_\_

Form "B" (VA)

**SITE CHARACTERIZATION** (Please denote if the facility presently treats, stores, or disposes of hazardous waste. Also, mark the appropriate sub-category that occurs at the particular facility.)

**TREATER**

**STORER**

**DISPOSER**

☐ Filtration  
☐ Incineration  
☐ Thermal Reduction  
☐ Recycling/Recovery  
☐ Chem/Phys/Bio Treatments  
☐ Reprocessing  
☐ Solvent Recovery  
☐ Other \_\_\_\_\_

☐ Open Pile  
☐ Surface Impoundment  
☒ Drum  
☐ Above ground tank(s)  
☐ Below ground tank(s)  
☐ Other \_\_\_\_\_

☐ Landfill operation  
☐ Land treatment  
☐ Surface Impoundment  
☐ Incineration  
☐ Other \_\_\_\_\_

VA HWM Regs.

**INSPECTION PROCEDURE**

1. Does the facility generate hazardous wastes? (Yes) No

Note: Please complete the generator's checklist if TSD facility generates hazardous wastes which are disposed of off-site.

9.02.03(a)

2. Does the facility receive hazardous waste from a foreign source? Yes (No)

If yes, has the facility notified the Commissioner of the date of arrival? Yes No

9.02.04(a)

3. For on-site tsd, does the facility have a sufficient waste analysis? (Yes) No

9.02.04

4. For off-site, does the facility have in place a waste analysis plan? If so, Yes No

- |                   |  |   |
|-------------------|--|---|
| 9.02.04(a)(1)     | a) Does the plan enable facility personnel to identify hazardous wastes being handled by the facility?   | Yes    No   |
| 9.02.04(b)(3)     | b) Does the plan enable facility personnel to confirm that wastes actually received at the TSD facility are the wastes indicated on the generator's manifest form?   | Yes    No   |
| 9.02.05(b)(1)     | 5. *Does the TSD facility have a 24-hour surveillance system which monitors and controls entry to the active portion of the facility, including:   | Yes    No   |
| 9.02.05(b)(2)(i)  | a) an artificial or natural boundary which surrounds active portions of the facility and,  | all inside<br>Yes    No   |
| 9.02.05(b)(2)(ii) | b) A means to control entry at all times, i.e., gates, attendants, locked entrances, etc.?   | Yes    No   |
| 9.02.05(c)        | 6. *Does the TSD facility have a restricted access sign posted at each entrance to the active portion of the facility? (an example would be: "Danger - Unauthorized Personnel Keep Out!") If so,   | Yes    No   |
|                   | a) Is the sign legible from a distance of 25 feet?   | Yes    No   |
|                   | b) Is the sign in English or any other foreign language predominant to the geographical area?  | Yes    No   |
| 9.02.06(b)(1)     | 7. Does the TSD facility have a written schedule for inspecting all emergency equipment, security devices, and operating and structural equipment, important to the prevention, detection or response to environmental/human health emergencies? | not written, but inspected daily - usually on the hour<br>Yes    No ✓ |
| 9.02.06(d)        | 8. Does the facility have an inspection log for the items in question #7 that includes the date, time of inspection, observations made, and inspector's initials?  | Yes    No ✓   |
| 9.02.07(d)(1)     | 9. Does the TSD facility maintain a record of job titles for personnel that are involved with hazardous waste management?  | Yes    No ✓   |

- |               |  |   |                                     |
|---------------|--|---|-------------------------------------|
| 9.02.07(d)(1) | 10. Does the TSD facility have the name of the employee filling each position in hazardous waste management?   | Yes   | <input checked="" type="radio"/> No |
| 9.02.07(d)(2) | 11. Does the TSD facility have on record a written position description of each job title noted in Question #9?  | Yes   | <input checked="" type="radio"/> No |
| 9.02.07(a)    | 12. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?  | Yes   | <input checked="" type="radio"/> No |
| 9.02.07(d)(3) | 13. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #7?  | Yes   | <input checked="" type="radio"/> No |
| 9.02.07(d)(4) | 14. Does the facility have records to document this training?  | Yes   | <input checked="" type="radio"/> No |
| 9.03.02       | 15. *At the TSD facility, is the following equipment installed:  |   |                                     |
| 9.03.02(a)    | a) An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion?  | <input checked="" type="radio"/> Yes            | No                                  |
| 9.03.02(b)    | b) A device at the scene of hazardous waste TSD operations capable of summoning emergency assistance from Police, Fire departments, etc.?  | <input checked="" type="radio"/> Yes            | No                                  |
| 9.03.02(c,d)  | c) Fire control equipment and an adequate supply of fire fighting water or fire suppression chemicals?   | <input checked="" type="radio"/> Yes            | No                                  |
| 9.04          | 16. Does the facility have a contingency plan which contains the following elements:   | <input checked="" type="checkbox"/> see comment |                                     |
| 9.04.02(a)    | a) A detailed description of emergency procedures which facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water?   | Yes   | No                                  |
| 9.04.02(c)    | b) A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations? (if such arrangements are refused, documentation of the refusal is sufficient). | Yes   | No                                  |

9.04.02(d)

- c) A listing of names, addresses, and phone numbers of the TSD facility emergency response coordinators?

Yes No

Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.

9.04.02(e)

- d) A list of appropriate emergency equipment necessary to cope with emergencies at the TSD facility?

Yes No

9.04.02(f)

- e) \*An evacuation plan for the TSD facility if Management believes such a plan is a definite requirement for their particular TSD facility?

Yes No

9.04.03

- f) Are copies of the plan sent to the local police and fire departments, hospital, and emergency rescue team?

Yes No

9.04.05

17. Does the facility have at all times at least one employee either on-call or on the site who is responsible for coordinating all emergency response measures?

Yes No

If so, please complete below:

Name: Paul Bang

Title: Planting Manager

Telephone Number: \_\_\_\_\_

9.04.08(a)

18. Does the TSD facility have a written operating record which contains the following information:

9.04.08(b)(1)

- a) A description of and the quantity of each hazardous waste received, and the method and date of treatment, storage or disposal? (Required if off-site generation)

N/A  
Yes No

9.04.08(b)(2)

- b) The location of each hazardous waste within the facility and the quantity at each location?

(Yes) No

9.04.08(b)(3)

- c) Detailed records and results of waste analyses and incineration trial tests performed on wastes coming into the facility? (Required if off-site generation)

(Yes) No

9.04.08(b)(4)	d) Detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan?	N/A	Yes	No
9.04.08(b)(5)	e) Detailed records and results of inspections performed on facility emergency equipment, TSD systems, and hazardous waste areas?		Yes	No <input checked="" type="checkbox"/>
9.04.08(b)(6)	f) Detailed monitoring, testing, and analytical data where required?		Yes <input type="checkbox"/>	No
9.06.03	19. Have the TSD facility operators prepared written closure plans?		Yes	No <input checked="" type="checkbox"/>
9.06.08	20. Have the TSD facility operators prepared written post closure plans?	N/A	Yes	No
9.04.07	21. Does the TSD facility receive hazardous waste from off-site generators? If yes, are the following procedures implemented:		Yes	No <input type="checkbox"/>
5.05	a) Manifest copies are signed and dated		Yes	No
5.05.03	b) A copy is given to the transporter		Yes	No
5.05.04	c) A copy is sent to the generator		Yes	No
5.05.05	d) A copy is returned and filed at the TSD facility		Yes	No
9.05	22. Does the facility owner utilize surface impoundments, landfills or land treatment technologies?		Yes	No <input type="checkbox"/>
9.05	23. If yes, has the owner implemented a groundwater monitoring program?		Yes	No
	24. Has an annual report been filed?		Yes <input type="checkbox"/>	No

given to me

MUST BE OBSERVED

9.02.08(a)	a) Open fires	Yes	No <input type="checkbox"/>
9.02.08(b)(2,3)	b) Fumes or gases	Yes	No <input type="checkbox"/>
9.02.08(b)(4)	c) Leaks or corrosion in containers or other storage structures	Yes	No <input type="checkbox"/>
9.08.02			



9.02.08(b)(5)

9.03.01

9.03.01

9.08.02

9.02.08(b)(1)

9.03.05

d) Leachate to receiving streams

Yes No *N/A*

e) Malfunction of equipment

Yes ☒ No

f) Bulging drums

Yes ☒ No

g) Excessive heat generation from storage facilities, lagoons, storage piles, etc.

Yes ☒ No

26. \*Does the TSD facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies?

☒ Yes No

27. Please provide detailed comments on specific problems encountered during the TSD facility inspection. For instance, industry requests for clarification of specific rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.

Comment #1 - There is no danger from this waste in case of fire. Since it is dry, the material can't be spilled onto the water. The storage area is inside, and therefore can not be released into the air, water, or land.

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Inspector's Name: Louis Lynn Cross

Title: Public Health Engineer

Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Mgt.

Office Location: 109 Governor Street, Richmond, VA 23219

Date of Inspection: Sept. 21, 1982

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Mgt.

Office Location: 109 Governor Street, Richmond, VA 23219

Date of Inspection: \_\_\_\_\_

**CHECKLIST FOR RCRA INSPECTION OF USE  
AND MANAGEMENT OF CONTAINERS**

Name of Facility: Rehrig International  
 Address: 901 N. Lombardy St.  
Richmond, Va. 23220  
 EPA Generator ID Number: VAD 089 028 377  
 Facility Inspection Representative: Paul Baum  
 Title: Planting Manager  
 Telephone Number: (804) 355-7864

RO USE

Inspection file

No. \_\_\_\_\_

Reviewer \_\_\_\_\_

Date reviewed \_\_\_\_\_

Form "I" (VA)

The questions contained in this checklist apply to owners and operators of all hazardous waste facilities that store containers of hazardous waste, except as Section 9.01 provides otherwise.

**Va. HWM Regs.**

- |                             |   |                                      |                                     |
|-----------------------------|---|--------------------------------------|-------------------------------------|
| 9.08.02                     | 1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?  | <input checked="" type="radio"/> Yes | <input type="radio"/> No            |
| 9.08.03                     | 2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes?                                       | <input checked="" type="radio"/> Yes | <input type="radio"/> No            |
| 9.08.04(a)                  | 3. Are all containers holding hazardous waste kept closed during storage?   | <input checked="" type="radio"/> Yes | <input type="radio"/> No            |
| 9.08.05                     | 4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week?  | <input checked="" type="radio"/> Yes | <input type="radio"/> No            |
| 9.02.06(b)(1)<br>9.02.06(d) | 5. Is an inspection log maintained? (See question #5 of TSD checklist.)   | Yes                                  | <input checked="" type="radio"/> No |
| 9.08.06                     | 6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?  | N/A                                  | Yes No                              |
| 9.08.07(a)                  | 7. Are incompatible wastes placed in the same container? (See Appendix 5 for examples.)   | N/A                                  | Yes No                              |
| 9.08.07(c)                  | 8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? | N/A                                  | Yes No                              |

Inspector's Name: Terri Lynn Cross

Title: Public Health Engineer

Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Management

Office Location: 109 Governor Street, Richmond, VA 23219

Date of Inspection: Sept. 21, 1982

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Management

Office Location: 109 Governor Street, Richmond, VA 23219

Date of Inspection: \_\_\_\_\_

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III-- 6th & Walnut Sts.

Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection-- Rehrig International  
VAD 089 028 377

DATE:

OCT 15 1987

TO: Harry J. Weber, Environmental Scientist  
Superfund/RCRA Compliance Section (3AW23) *HJW*

FILE

Thru: ~~Walter F. Lee~~, Chief  
Superfund/RCRA Compliance Section (3AW23)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS  
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION  
OF THESE VIOLATIONS.

CHECKLIST FOR RCRA INSPECTION OF GENERATORS

Name of Facility: Perrig International Inc.  
 Address: 901 N. Lombardy St  
Pickman 23220  
 EPA Generator ID Number: VAD 089 028 377  
 Facility Inspection Representative: Paul Baug  
 Title: Plating Manager  
 Telephone Number: (804) 355-7864

RO USE

Inspection file

No. \_\_\_\_\_

Reviewer \_\_\_\_\_

Date reviewed: \_\_\_\_\_

Form "A" (VA)

VA HWM Regs.

1. Please provide a brief narrative explaining the type of work activity that occurs at the generator.

Manufacture of shopping  
carts and nickel-chrome  
plating of the carts.

2. Does the generator dispose of its wastes:

a) On-site?

(Circle one or both)

☒ b) Off-site?

Note: If on-site, then checklist for both a generator and TSD facility must be completed if on-site more than 90 days.

3. What is the amount (in kilograms) or number, as appropriate, of:

3.03.01

a) Hazardous waste produced per month by the generator facility? 1760 kilograms

3.03.02

b) Hazardous waste accumulated by the generator facility at any time?  
15,400 kilograms ~70 drums

3.03.03.(a,b)

c) Any commercial chemical product or manufacturing chemical intermediate having the generic name listed in 40 CFR Part 261.33(e) or any off-specification

commercial chemical product or manufacturing chemical intermediate which, if it met specifications, would have the generic name listed in 40 CFR Part 261.33(e) which is discarded each month or is accumulated at any time for discarding? 0 kilograms

3.03.03.(c)

d) Containers identified in 40 CFR Part 261.33(c) larger than 20 liters in capacity that are discarded each month or are accumulated at any time for discarding? 0 (number)

3.03.03(d)

e) Inner liners from containers identified under 40 CFR Part 261.33(c) that is discarded each month or is accumulated for discarding? 0 kilograms

3.03.03(e)

f) Any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill of any commercial chemical product or manufacturing chemical intermediate having the generic name listed in 40 CFR Part 261.33(e) that is discarded each month or is accumulated at any time for discarding? 0 kilograms

If the amount of (c) and (d) is less than 1, the amount of (e) is less than 10, the amount of (f) is less than 100, and the amount of (a) and (b) is less than 1000, then the facility qualifies as a small quantity generator and Form C should be completed instead of Form A.

4. What categories of hazardous wastes originate at the generator's facility? Please circle yes or no.

3.07

a) Ignitable wastes

Yes ☒ No

3.09

b) Reactive wastes

Yes ☒ No

3.08

c) Corrosive wastes

Yes ☒ No

3.10

d) EP Toxic wastes

Yes ☒ No

3.11

e) RCRA Listed Waste

☒ Yes No

5. Is the generator presently:

a) Treating hazardous waste?

☒ Yes No

b) Storing hazardous waste?

Yes No

c) Disposing hazardous waste?

Yes No

Note: if the generator performs any of the activities noted in Question #5 [except as provided for at 9.01(c)(7)], then the inspector must complete Form B, entitled "RCRA Checklist for inspection of hazardous waste treatment, storage and disposal facilities."

6.04

6. Is a manifest system currently in operation at the generator's facility so that off-site shipment of hazardous wastes can be tracked?

*name sent off-site to date*  
Yes No

7. Please inspect the generator's manifest for the following information:

5.04.03(c)

a) Is the TSD facility which receives a generator's hazardous waste identified by name, address, telephone number, and EPA ID number?

Yes No

5.04.02

b) Is a serialized manifest document number included on the form?

Yes No

5.04.03(a)

c) Are the generator's name, address, telephone number and EPA ID number included on the form?

Yes No

5.04.03(b)

d) Are the name, address, telephone number, and EPA identification number of each transporter included on the form?

Yes No

5.04.04

e) Is a description of the generator's hazardous waste to be treated, stored, or disposed included on the manifest?

Yes No

5.04.05

f) Are the quantity of each waste, by units of weight or volume, and the type and number of containers loaded in the transport vehicle included on the manifest form?

Yes No

5.04.06

g) Is the following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature?

"This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled



	and are in proper condition for transportation according to the available regulations of the DOT and EPA."	Yes	No
5.04.07	h) Are there adequate copies of the manifest available for generator, transporter, and TSD's?	Yes	No
6.05.05	8. Is hazardous waste being accumulated on-site by the generator for less than 90 days? If yes,	Yes	<input checked="" type="radio"/> No
6.05.05(a)(3)	a) Is the date accumulation of waste began clearly marked on each storage container?	Yes	No
6.05.05(a)(2)	b) Are storage containers in good condition, i.e., no corrosion, leaking, or structural deformations?	Yes	No
6.05.05(a)(4)	c) At the time of accumulation, are the storage containers clearly labeled as containing a particular hazardous waste in accordance with DOT regulations?	Yes	No
9.04.01(a)	9. Does the generator have an established contingency plan to deal with emergencies that may impact hazardous waste currently in storage at the facility?	<i>hazardous waste is dry cake - can't spill</i> <i>is not flammable</i> Yes <input checked="" type="radio"/> No <i>X see comment 1</i>	
9.02.07(a)	10. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?	Yes	<input checked="" type="radio"/> No ✓
9.02.07(d)(1)	11. Does the generator facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job?	Yes	<input checked="" type="radio"/> No ✓
9.02.07(d)(2)	12. Does the generator facility have on record a written position description for each job title noted in Question #11?	Yes	<input checked="" type="radio"/> No ✓
9.02.07(d)(3)	13. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #11?	Yes	<input checked="" type="radio"/> No ✓
9.03.02	14. *At the generator facility, is the following equipment installed:		
9.03.02(a)	a) An internal communications or alarm system capable of providing immediate		

9.03.02(b) personnel if the hazardous waste storage area is threatened by fire or explosion? ☒ Yes No

9.03.02(c,d) b) A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.? ☒ Yes No

9.03.05 c) Fire control equipment and an adequate supply of fire fighting water or fire suppression chemicals? ☒ Yes No

9.04 15. \*Does the generator facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? ☒ Yes No

9.04.02(a,b) 16. Does the facility have a contingency plan which contains the following elements: *does not have*

a) A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water? *N/A*  
☒ Yes No

9.04.02(c) b) A detailed description of arrangements formally agreed to by local police, fire departments, and state and local emergency teams to provide assistance during emergency situations? ☒ Yes No

9.04.02(d) c) A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators? ☒ Yes No

Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.

9.04.02(e) d) A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? ☒ Yes No

9.04.02(f) e) \*An evacuation plan for the generator facility if Management believes such a plan is a definite requirement for their particular generator facility. *not required*  
☒ Yes No

17. Please provide detailed comments on specific problems encountered during the inspection. For instance, industry requests for clarification of specific RCRA rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.

\* There is no danger from this waste, in case of fire since it is dry, the material can't be spilled onto the water. The storage area is inside, and therefore can not be released into the air, water, or land.

Inspector's Name: Terrie Lynn Cross  
 Title: Public Health Engineer  
 Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Management  
 Office Location: 109 Governor Street, Richmond, VA 23219  
 Date of Inspection: Sept. 21, 1982

Inspector's Name: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Management  
 Office Location: 109 Governor Street, Richmond, VA 23219  
 Date of Inspection: \_\_\_\_\_

**CHECKLIST FOR RCRA INSPECTION OF TREATMENT,  
STORAGE & DISPOSAL (TSD) FACILITIES**

Name of Facility: Rennig International  
 Address: 901 N. Lombardy St.  
Richmond 23220  
 EPA ID Number: YAD 089 028 377  
 Facility Inspection Representative: Paul Bang  
 Title: Plating Manager  
 Telephone: (804) 355-7864

RO USE

Inspection File

No. \_\_\_\_\_

Reviewer \_\_\_\_\_

Date reviewed \_\_\_\_\_

Form "B" (VA)

**SITE CHARACTERIZATION** (Please denote if the facility presently treats, stores, or disposes of hazardous waste. Also, mark the appropriate sub-category that occurs at the particular facility.)

**TREATER**

**STORER**

**DISPOSER**

☐ Filtration  
☐ Incineration  
☐ Thermal Reduction  
☐ Recycling/Recovery  
☐ Chem/Phys/Bio Treatments  
☐ Reprocessing  
☐ Solvent Recovery  
☐ Other \_\_\_\_\_

☐ Open Pile  
☐ Surface Impoundment  
☒ Drum  
☐ Above ground tank(s)  
☐ Below ground tank(s)  
☐ Other \_\_\_\_\_

☐ Landfill operation  
☐ Land treatment  
☐ Surface Impoundment  
☐ Incineration  
☐ Other \_\_\_\_\_

VA HWM Regs.

**INSPECTION PROCEDURE**

1. Does the facility generate hazardous wastes? ☒ Yes ☐ No

Note: Please complete the generator's checklist if TSD facility generates hazardous wastes which are disposed of off-site.

9.02.03(a)

2. Does the facility receive hazardous waste from a foreign source? Yes ☒ No

If yes, has the facility notified the Commissioner of the date of arrival? Yes ☐ No

9.02.04(a)

3. For on-site tsd, does the facility have a sufficient waste analysis? ☒ Yes ☐ No

9.02.04

4. For off-site, does the facility have in place a waste analysis plan? If so, Yes ☐ No

- |                   |  |                                      |  |
|-------------------|--|--------------------------------------|--|
| 9.02.04(a)(1)     | a) Does the plan enable facility personnel to identify hazardous wastes being handled by the facility?   | Yes                                  | No   |
| 9.02.04(b)(3)     | b) Does the plan enable facility personnel to confirm that wastes actually received at the TSD facility are the wastes indicated on the generator's manifest form?   | Yes                                  | No   |
| 9.02.05(b)(1)     | 5. *Does the TSD facility have a 24-hour surveillance system which monitors and controls entry to the active portion of the facility, including:   | <input checked="" type="radio"/> Yes | No   |
| 9.02.05(b)(2)(i)  | a) an artificial or natural boundary which surrounds active portions of the facility and,  | <input checked="" type="radio"/> Yes | No <i>all inside</i>   |
| 9.02.05(b)(2)(ii) | b) A means to control entry at all times, i.e., gates, attendants, locked entrances, etc.?   | <input checked="" type="radio"/> Yes | No   |
| 9.02.05(c)        | 6. *Does the TSD facility have a restricted access sign posted at each entrance to the active portion of the facility? (an example would be: "Danger - Unauthorized Personnel Keep Out!") If so,   | Yes                                  | <input checked="" type="radio"/> No  |
|                   | a) Is the sign legible from a distance of 25 feet?   | Yes                                  | No   |
|                   | b) Is the sign in English or any other foreign language predominant to the geographical area?  | Yes                                  | No   |
| 9.02.06(b)(1)     | 7. Does the TSD facility have a written schedule for inspecting all emergency equipment, security devices, and operating and structural equipment, important to the prevention, detection or response to environmental/human health emergencies? | Yes                                  | No <i>not written, but inspected daily - usually on the hour</i> <input checked="" type="radio"/> No ✓ |
| 9.02.06(d)        | 8. Does the facility have an inspection log for the items in question #7 that includes the date, time of inspection, observations made, and inspector's initials?  | Yes                                  | <input checked="" type="radio"/> No ✓  |
| 9.02.07(d)(1)     | 9. Does the TSD facility maintain a record of job titles for personnel that are involved with hazardous waste management?  | Yes                                  | <input checked="" type="radio"/> No ✓  |

- |               |  |                                      |                                     |
|---------------|--|--------------------------------------|-------------------------------------|
| 9.02.07(d)(1) | 10. Does the TSD facility have the name of the employee filling each position in hazardous waste management?   | Yes                                  | <input checked="" type="radio"/> No |
| 9.02.07(d)(2) | 11. Does the TSD facility have on record a written position description of each job title noted in Question #9?  | Yes                                  | <input checked="" type="radio"/> No |
| 9.02.07(a)    | 12. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?  | Yes                                  | <input checked="" type="radio"/> No |
| 9.02.07(d)(3) | 13. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #7?  | Yes                                  | <input checked="" type="radio"/> No |
| 9.02.07(d)(4) | 14. Does the facility have records to document this training?  | Yes                                  | <input checked="" type="radio"/> No |
| 9.03.02       | 15. *At the TSD facility, is the following equipment installed:  |                                      |                                     |
| 9.03.02(a)    | a) An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion?  | <input checked="" type="radio"/> Yes | No                                  |
| 9.03.02(b)    | b) A device at the scene of hazardous waste TSD operations capable of summoning emergency assistance from Police, Fire departments, etc.?  | <input checked="" type="radio"/> Yes | No                                  |
| 9.03.02(c,d)  | c) Fire control equipment and an adequate supply of fire fighting water or fire suppression chemicals?   | <input checked="" type="radio"/> Yes | No                                  |
| 9.04          | 16. Does the facility have a contingency plan which contains the following elements:   | * see comment                        |                                     |
| 9.04.02(a)    | a) A detailed description of emergency procedures which facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water?   | Yes                                  | No                                  |
| 9.04.02(c)    | b) A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations? (if such arrangements are refused, documentation of the refusal is sufficient). | Yes                                  | No                                  |

- 9.04.02(d) c) A listing of names, addresses, and phone numbers of the TSD facility emergency response coordinators? Yes No  
Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.
- 9.04.02(e) d) A list of appropriate emergency equipment necessary to cope with emergencies at the TSD facility? Yes No
- 9.04.02(f) e) \*An evacuation plan for the TSD facility if Management believes such a plan is a definite requirement for their particular TSD facility? Yes No
- 9.04.03 f) Are copies of the plan sent to the local police and fire departments, hospital, and emergency rescue team? Yes No
- 9.04.05 17. Does the facility have at all times at least one employee either on-call or on the site who is responsible for coordinating all emergency response measures? Yes No

If so, please complete below:

Name: Paul Bang  
Title: Planting Manager  
Telephone Number: \_\_\_\_\_

- 9.04.08(a) 18. Does the TSD facility have a written operating record which contains the following information:
- 9.04.08(b)(1) a) A description of and the quantity of each hazardous waste received, and the method and date of treatment, storage or disposal? (Required if off-site generation) N/A Yes No
- 9.04.08(b)(2) b) The location of each hazardous waste within the facility and the quantity at each location? (Yes) No
- 9.04.08(b)(3) c) Detailed records and results of waste analyses and incineration trial tests performed on wastes coming into the facility? (Required if off-site generation) (Yes) No

9.04.08(b)(4)	d) Detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan?	N/A	Yes	No
9.04.08(b)(5)	e) Detailed records and results of inspections performed on facility emergency equipment, TSD systems, and hazardous waste areas?		Yes	No <input checked="" type="checkbox"/>
9.04.08(b)(6)	f) Detailed monitoring, testing, and analytical data where required?		<input checked="" type="checkbox"/> Yes	No
9.06.03	19. Have the TSD facility operators prepared written closure plans?		Yes	No <input checked="" type="checkbox"/>
9.06.08	20. Have the TSD facility operators prepared written post closure plans?	N/A	Yes	No
9.04.07	21. Does the TSD facility receive hazardous waste from off-site generators? If yes, are the following procedures implemented:		Yes	No <input checked="" type="checkbox"/>
5.05	a) Manifest copies are signed and dated		Yes	No
5.05.03	b) A copy is given to the transporter		Yes	No
5.05.04	c) A copy is sent to the generator		Yes	No
5.05.05	d) A copy is returned and filed at the TSD facility		Yes	No
9.05	22. Does the facility owner utilize surface impoundments, landfills or land treatment technologies?		Yes	No <input checked="" type="checkbox"/>
9.05	23. If yes, has the owner implemented a groundwater monitoring program?		Yes	No
	24. Has an annual report been filed?		<input checked="" type="checkbox"/> Yes	No

given to me

MUST BE OBSERVED

9.02.08(a)	a) Open fires	Yes	No <input checked="" type="checkbox"/>
9.02.08(b)(2,3)	b) Fumes or gases	Yes	No <input checked="" type="checkbox"/>
9.02.08(b)(4)	c) Leaks or corrosion in containers or other storage structures	Yes	No <input checked="" type="checkbox"/>
9.08.02			



- |               |  |                                      |                                     |     |
|---------------|--|--------------------------------------|-------------------------------------|-----|
| 9.02.08(b)(5) | d) Leachate to receiving streams   | Yes                                  | No                                  | N/A |
| 9.03.01       | e) Malfunction of equipment  | Yes                                  | <input checked="" type="radio"/> No |     |
| 9.03.01       | f) Bulging drums   | Yes                                  | <input checked="" type="radio"/> No |     |
| 9.08.02       |  |                                      |                                     |     |
| 9.02.08(b)(1) | g) Excessive heat generation from storage facilities, lagoons, storage piles, etc.   | Yes                                  | <input checked="" type="radio"/> No |     |
| 9.03.05       | 26. *Does the TSD facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? | <input checked="" type="radio"/> Yes | No                                  |     |

27. Please provide detailed comments on specific problems encountered during the TSD facility inspection. For instance, industry requests for clarification of specific rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.

Comment #1 - There is no danger from this waste in case of fire. Since it is dry, the material can't be spilled onto the water. The storage area is inside, and therefore can not be released into the air, water, or land.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Inspector's Name: Louis Lynn Cross

Title: Public Health Engineer

Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Mgt.

Office Location: 109 Governor Street, Richmond, VA 23219

Date of Inspection: Sept. 21, 1982

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Mgt.

Office Location: 109 Governor Street, Richmond, VA 23219

Date of Inspection: \_\_\_\_\_

CHECKLIST FOR RCRA INSPECTION OF USE  
AND MANAGEMENT OF CONTAINERS

RO USE

Name of Facility: Lehrig International

Inspection file

Address: 901 N. Lombardy St.

No. \_\_\_\_\_

Richmond, Va. 23220

Reviewer \_\_\_\_\_

EPA Generator ID Number: VAD 089 028 377

Date reviewed \_\_\_\_\_

Facility Inspection Representative: Paul Baum

Form "I" (VA)

Title: Planting Manager

Telephone Number: (804) 355-7864

The questions contained in this checklist apply to owners and operators of all hazardous waste facilities that store containers of hazardous waste, except as Section 9.01 provides otherwise.

Va. HWM Regs.

9.08.02

1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?

☒ Yes

No

9.08.03

2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes?

☒ Yes

No

9.08.04(a)

3. Are all containers holding hazardous waste kept closed during storage?

☒ Yes

No

9.08.05

4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week?

☒ Yes

No

9.02.06(b)(1)

9.02.06(d)

5. Is an inspection log maintained? (See question #5 of TSD checklist.)

Yes

☒ No

9.08.06

6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?

N/A  
Yes No

9.08.07(a)

7. Are incompatible wastes placed in the same container? (See Appendix 5 for examples.)

N/A  
Yes No

9.08.07(c)

8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices?

N/A  
Yes No

Inspector's Name: Terri Lynn Cross

Title: Public Health Engineer

Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Management

Office Location: 109 Governor Street, Richmond, VA 23219

Date of Inspection: Sept. 21, 1982

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Va. State Health Dept., Div. of Solid & Hazardous Waste Management

Office Location: 109 Governor Street, Richmond, VA 23219

Date of Inspection: \_\_\_\_\_

**APRIL 21, 1986**

**LETTER FROM REHRIG INTERNATIONAL TO USEPA**

# REHRIG INTERNATIONAL

## RICHMOND PLANT

901 North Lombardy Street  
Richmond, Virginia 23220

(804) 355-7864

April 21, 1986

US. E.P.A.  
Region III  
ATTN: Mary Beck (3HW31)  
841 Chestnut Building  
Philadelphia, PA 19107

Dear Ms. Beck:

I, Paul Bauz, Plating Manager for Rehrig International, Incorporated, hereby certify that I talked to Ms. Mary Beck on April 21, 1986 and was assured of a 30 day extension to provide information as requested in the "S.W.M.U." letter dated February 24, 1986.

Sincerely,

*Paul Bauz*  
Paul Bauz  
Plating Manager

cc: D.P. Goodell

Attachments: two copies

*Mary Beck*  
*4/23/86*



THE LEADER IN CONTAINERS SINCE 1913

**MAY 20, 1986**

**LETTER FROM REHRIG INTERNATIONAL TO USEPA**

SWMU RESPONSE



# REHRIG INTERNATIONAL

**RICHMOND PLANT**

901 North Lombardy Street  
Richmond, Virginia 23220

(804) 355-7864

Certified Mail - Return Receipt Requested

May 20, 1986

Environmental Protection Agency  
Region III  
841 Chestnut Building  
Philadelphia, PA 19107

ATTN: Ms. Mary Beck

Re: S.W.M.U. Disclosure (2 copies enclosed)  
Rehrig International, Inc.  
VAD 08-902-8377

Dear Ms. Beck:

The following is in response to your letter dated  
February 24, 1986:

(1). TOPOGRAPHIC MAP

As of this date we have not received the 7½ minute quad sheet from the Dept. of Interior. Attached are copies of our application. We will expedite the map to you immediately upon our receipt of it.

HISTORY OF BUILDING

The building was originally built in 1904 by Export Leaf Tobacco Company and was used as a tobacco leaf storage facility until 1977. Building was purchased in 1977 by Bowe Street Associates, 1506 Bloomfield Road, Richmond, VA 23225. The building remained vacant from 1977 until 1979 when Rehrig International leased a portion of the building. Prior to the installation of Rehrig International's chrome plating line in 1980, there were no former solid waste units located in this building. The following is a history of Rehrig International's occupation of the building (please refer to attached plant layout):

- |    |                   |   |   |
|----|-------------------|---|---|
| A. | 7-1-79 to 2-1-80  | = | Bays A1, B1, B2, & B3.                      |
| B. | 2-1-80 to 5-1-82  | = | Add Bay A2.                                 |
| C. | 5-1-82 to 7-1-83  | = | Add Bay A3.                                 |
| D. | 7-1-83 to PRESENT | = | Add Bay's A4, A5, A6, B4, B5, B6, B7, & B8. |

Rehrig International presently leases the entire building.



THE LEADER IN CONTAINERS SINCE 1913

May 20, 1986

- (2). UNIT'S FUNCTION: To receive waste water from the chrome plating operation and to pretreat for removal of metals from the nickel chrome plating operation.

MATERIAL OF CONSTRUCTION: Specially lined pit 10 ft. x 10 ft. x 10 ft. From this pit the water is pumped through a series of lined tanks, the last tank having a baffle for collecting sludge. Then the water is pumped through a filter press.

DIMENSION, CAPACITY & ANCILLARY PIPING: All piping is CPVC, schedule 80. Capacity is 30 gallons per minute.

ENGINEERING DRAWINGS: None Available.

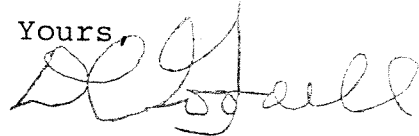
- (3). DESCRIPTION OF SOLID WASTE: Waste water from nickel chrome plating operation.

QUANTITIES: Annual quantity of waste water passing through system is approximately 6500 ccf.

DATES OF OPERATION: Continually with the plating operation.

RELEASES: No releases of hazardous waste have ever been originated from this unit.

Yours,

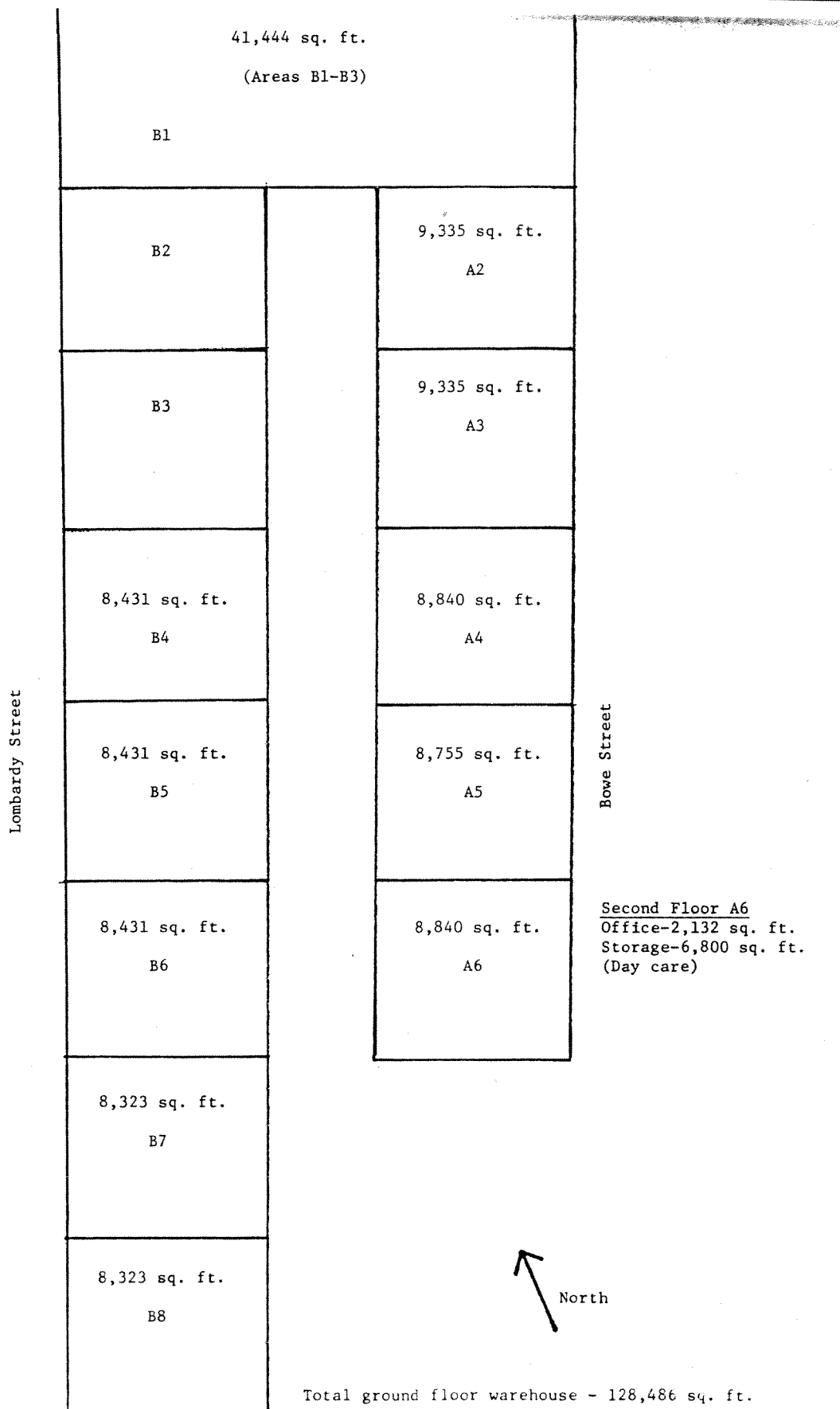


D.P. Goodell  
Vice President,  
General Manager

Enclosures

cc: Paul Bauz  
Plating Manager

LEL/vc



UNITED STATES DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY

MAP ORDER BLANK

TO: U.S. GEOLOGICAL SURVEY  
1200 SOUTH EADS STREET  
ARLINGTON, VIRGINIA 22202

DATE: 4-29-86

FROM: Name BEHRIG INTERNATIONAL, INC.  
Street Address 901 N. LOMBARDY ST  
City RICHMOND State VA Zip Code 23220

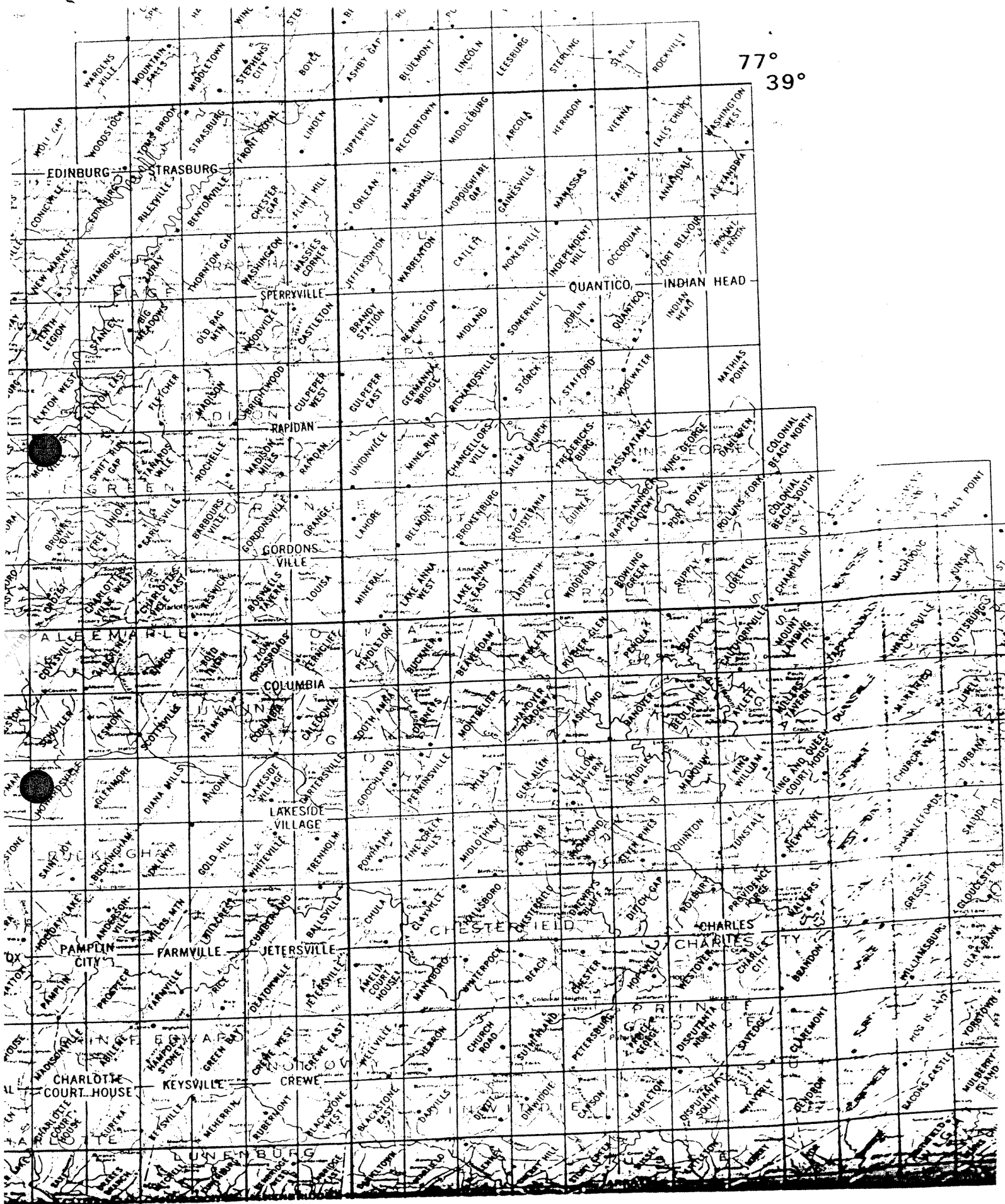
ALPHABETIZE map names in state groups. List THEMATIC maps by Alpha-Numeric number.

Quantity	Map Name	State	Scale	Unit Price	Total Price
1	2 STANDARD TOPOGRAPHIC			\$	\$
2	QUADRANGLE MAP	VA-	1:24,000'	2.50	5.00
3		RICHMOND			
4					
5	(Per area highlighted				
6	on attached)				
7					
8					
9	- PLEASE RUSH -				
10					
11					
12					
13					
14					
15					
16					
Remittance (payable to Dept. of the Interior-USGS)				Total	5.00

for PROMPT, ACCURATE SHIPMENT PLEASE FILL IN THE FOLLOWING LABEL  
Please PRINT or TYPEWRITE

U.S. GEOLOGICAL SURVEY  
1200 South Eads Street  
Arlington, Virginia 22202

Name BEHRIG INTERNATIONAL, INC.  
Street Address 901 N. LOMBARDY ST  
City RICHMOND State VA Zip Code 23220



INTERNATIONAL  
N. LOMBARDY STREET  
RICHMOND, VIRGINIA 23220

PAY  
TO THE  
ORDER OF

*Dept. of Interior - USGS*

15098

*4-29* 19*86*

FORM 1178

SOVRAN BANK  
Sovran Bank, N.A. Richmond, Virginia 23261

**EXACTLY \$5 AND 00 CTS**

\$ *5.00*

DOLLARS

FOR *Attached*

*Larry Lewis*

⑈00015098⑈ ⑆051000017⑆ 0200 9106⑈

6/20/86

## CHECKLIST FOR SWMU RESPONSES

NAME OF FACILITY  
EPA ID No.Rehrig International  
VAD 08 902 8377

DID THE FACILITY SUBMIT THE FOLLOWING DATA:

The location of all existing and former solid waste management units (SWMUs) on the facility property (maps 1" = 200')

YES \_\_\_\_\_ NO \_\_\_\_\_

*Map was ordered but has not been rec'd by the fac.**Map rec'd 7/11 but not the correct type*

Construction design information of each SWMU

YES ☒ NO \_\_\_\_\_

Information of the waste handled at each SWMU

YES ☒ NO \_\_\_\_\_

Data and descriptions of potential or prior releases from each SWMU

YES ☒ NO \_\_\_\_\_

Certification

YES \_\_\_\_\_ NO ☒

Description/Number of SWMUs (non RCRA regulated)

Land Disposal \_\_\_\_\_

Incinerators \_\_\_\_\_

Land Treatment \_\_\_\_\_

Tanks \_\_\_\_\_

Surface Imp. \_\_\_\_\_

Drums \_\_\_\_\_

Other \_\_\_\_\_

*1 pit & tanks for  
pretreatment of nickel  
chrome plating waste*

Is there evidence of contamination

Groundwater YES \_\_\_\_\_ NO ☒Surface water YES \_\_\_\_\_ NO ☒Air YES \_\_\_\_\_ NO ☒PRIORITY

HIGH \_\_\_\_\_ Reported evidence of release to air, ground or surface water

MEDIUM \_\_\_\_\_ No releases reported; but land based SWMUs reported

LOW ☒ Everything else

COMMENTS:

**JULY 1, 1986**

**LETTER AND ENCLOSURE FROM COMMONWEALTH OF VIRGINIA  
DEPARTMENT OF WASTE MANAGEMENT TO REHRIG INTERNATIONAL**





# COMMONWEALTH of VIRGINIA

DEPARTMENT OF WASTE MANAGEMENT  
11th Floor, Monroe Building  
101 N. 14th Street  
Richmond, VA 23219  
(804) 225-2667

A large, stylized handwritten signature, possibly reading "JON", written in black ink.

CERTIFIED - RETURN  
RECEIPT REQUESTED

Larry E. Lewis  
Rehrig International  
901 N. Lombardy Street  
Richmond, Virginia 23220

Re: EPA ID # VAD089028377

Dear Mr. Lewis:

Enclosed is a copy of the inspection checklists for your facility completed on December 8, 1987, showing compliance with the Virginia Hazardous Waste Management Regulations.

If you have any questions, please call me at (804)225-2321.

Sincerely,

A handwritten signature in black ink, appearing to read "William J. Sarnecky".

William J. Sarnecky, Chemical Engineer  
Division of Technical Services

Enclosure

WJS:308/lhc

SURVEY SHEET

7/1/86

Name of Facility: REHIG INTERNATIONAL  
 Address: 901 NORTH LOMBARDOY STREET  
RICHMOND, VA 23220  
 EPA Generator ID Number: VAD 089028377  
 Facility Inspection Representative: PAUL BAUZ  
 Title: PLATING MANAGER  
 Telephone Number: (804) 355-7864

1. What is business activity of firm? (i.e., furniture mfg., metal plating, recycling, etc.) MANUFACTURE SHOPPING CARTS
2. Give brief description of waste stream(s) and code designation(s).  
F-006 NICKEL-CHROME PLATING SLUDGE.
3. List the amounts of hazardous waste generated, recycled and accumulated.

- a. Characteristic - Ignitable (D001)  
                           Corrosive (D002)  
                           Reactive (D003)  
                           EP Toxic (D004-D017)

b. Listed (F, K, or U list) F-006

c. Listed (P)

d. Waste from spills of P and U list

	(1) Total Generated #/mo	(2) Total Recycled #/mo	(3) Difference #/mo (1) minus (2)	(4) Total Regulated #/mo (1) or (3)	(5) Total Accumulated
	1				
	1				
	1				
	1				
	1700	0		1700	34,000 POUNDS

4. Based on the above information, the company is classified as:
- a. Small quantity generator exempt from regulations. (Form C)
  - b. Recycler not exempt from regulations. (Form A)
  - c. Generator. (Form A)
5. If facility treats, stores or disposes on-site complete Form B (unless exempt under § 9.).
6. Complete the appropriate checklists.
- |                              |  |
|------------------------------|--|
| <u>Container</u> (Form I)    | Tank (Form J)                                      |
| Surface Impoundment (Form K) | Incineration & Thermal Treatment (Form O & P)      |
| Landfill (Form N)            | Physical, Chemical & Biological Treatment (Form Q) |
7. Comments:

LAST SHIPMENT OF WASTE IN DRUMS WAS 9-12-83,  
PROCESS PLATING TANKS CLEANED IN AUGUST  
AND 39,743 lbs WERE SHIPPED ON 8/24/87.

Inspector's Name: William SARNELKY

Title: CHEMICAL ENGINEER

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: 12-8-87

CHECKLIST FOR RCRA INSPECTION OF GENERATORS

Name of Facility: BEHIG INTERNATIONAL

Address: 901 NORTH LOMBARDY STREET

RICHMOND, VA 23220

EPA Generator ID Number: VAD 089028377

Facility Inspection Representative: PAUL BAUZ

Title: PLAYING MANAGER

Telephone Number: (804) 355-7864

VA HWM Regs.

Reference:

6.3

1. Is a manifest system currently used by the generator so that off-site shipment of hazardous wastes can be tracked?

☒ Yes ☐ No

2. Is the following included on the generators manifest?

5.3.B.1.

- a) The generator's name, address, telephone number and EPA ID number.

☒ Yes ☐ No

5.3.B.2.

- b) A unique five digit number assigned to this manifest by the generator.

☒ Yes ☐ No

5.3.B.3.

- c) Total number of pages used to complete the manifest.

☒ Yes ☐ No

5.3.B.4.

- d) The company name and EPA identification of each transporter.

☒ Yes ☐ No

5.3.B.5.

- e) The company name, site address and the EPA ID number of the facility designated to receive the waste listed on the manifest.

☒ Yes ☐ No

5.3.B.6.

- f) The U.S. DOT description of each waste to include its proper shipping name, hazard class, and ID number (UN/NA), as identified in the Virginia Regulations Governing the Transportation of Hazardous Materials.

☒ Yes ☐ No

- 5.3.B.7. g) The units of weight or volume and the type and number of containers loaded in the transport vehicle included on the manifest form? ☒ Yes ☐ No
- 5.3.B.8. h) In case of international shipment, the point of departure (city & state) for those shipments destined for treatment, storage, and disposal outside the jurisdiction of the United States. *N/A* ☒ Yes ☐ No
- 5.3.C. i) The following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature.
- "I hereby declare that the content of this consignment are fully and accurately described above by proper shipping name and are classified packed, marked, and labeled, and condition for transport by [mode of transportation] according to applicable international and national governmental regulations."
- ☒ Yes ☐ No
- 6.5.C.2. 3. Have manifest been received from TSD for waste shipped over 45 days ago. ☒ Yes ☐ No
- if not,
- has the generator filed an exception report? *N/A* ☒ Yes ☐ No
- 5.5.A.7. 4. Did the generator determine that the transporter has a Virginia transporter permit? ☒ Yes ☐ No
- 6.4.E.1. 5. Is hazardous waste being accumulated on-site by the generator for less than 90 days? If yes, ☒ Yes ☐ No
- 6.4.E.1.a. a) Is the waste placed in either containers or tanks? (If yes, fill out appropriate checklist. If no, TSD permit is required.) ☒ Yes ☐ No
- 6.4.E.1.b. b) Is the date accumulation of waste began clearly and visibly marked on each container and, does it indicate accumulation for less than 90 days? *N/A* ☒ Yes ☐ No

- 6.4.E.1.c. c) During accumulation, are the storage containers and/or tank clearly labeled with the words Hazardous Waste? *N/A* Yes No
- 9.1.G.1. 6. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? ☒ Yes No
- 9.1.G.2. 7. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? ☒ Yes No
- 9.1.G.3. 8. Do personnel participate in an annual review of their initial training? ☒ Yes No
- 9.1.G.4.a. 9. Does the facility maintain a record of:
- (a) job titles for personnel that are involved with hazardous waste management; and ☒ Yes No
- (b) the name of the employee filling each job? ☒ Yes No
- 9.1.G.4.b. 10. Does the facility have on record a written position description for each job, title noted in Question #9? ☒ Yes No
- 9.1.G.4.c. 11. Does the facility maintain a written description of the type and amount of introductory and continuing training for those employees involved in hazardous waste management? ☒ Yes No
- 9.1.G.4.d. 12. Does the facility have records to document this training? ☒ Yes No
- 9.2.B.  
9.2.D. 13. At the facility, is the following equipment installed:
- 9.2.B.1. a) An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? ☒ Yes No

- 9.2.B.2.                      b) A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.?      ☒ Yes      No
- 9.2.B.(3, 4)                      c) Portable fire extinguishers, fire control, spill control, and decontamination equipment and water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system?      ☒ Yes      No
- 9.2.C.                      14. Is a record of tests and inspections of required equipment (question 11) maintained at the facility?      ☒ Yes      No
- 9.2.F.                      15. Does the facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies?      ☒ Yes      No
- 9.3.A.1.  
6.4.E.1.d.                      16. Does the facility have an established contingency plan to deal with any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to the air, soil, groundwater or surface water?      ☒ Yes      No
- 9.3.                      17. Does the contingency plan contain the following elements:
- 9.3.B.(1, 2)                      a) A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water?      ☒ Yes      No
- 9.3.B.4.                      b) A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators?      ☒ Yes      No  
List primary coordinator.

Name PAUL BAUT

Title PLATING MANAGER

Telephone 355-7864

- 9.3.B.5. c) A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? ☒ Yes No
- 9.3.B.5. d) Does this list specify the location and physical description of each item on the list and a brief description of each item on the list, and a brief outline of its capabilities. ☒ Yes No
- 9.3.B.6. e) An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? ☒ Yes No
- 9.3.C. f) Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? List: ☒ Yes No
- Richmond Fire Dept
- " Police "
- ESC
- 9.3.B. 1) Is there documentation to indicate the personnel listed above received the contingency plan? ☒ Yes No
- 9.3.F.(9, 10) g) If the contingency plan has been implemented, was a written report filed with the Executive Director and were the Executive Director and other required authorities properly notified before operations resumed? N/A Yes No
- 6.5.A. 18. Does the facility retain copies of all manifests, annual reports, and test results for at least three years? ☒ Yes No
- 6.5.B. 19. Has the facility submitted an annual report for the preceding calendar year? ☒ Yes No



20. Comments

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Inspector's Name:

W. Miam SARNECKY

Title:

CHEMICAL ENGINEER

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection:

12-8-87

Inspector's Name:

Title:

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection:

CHECKLIST FOR RCRA INSPECTION OF TREATMENT,  
STORAGE & DISPOSAL (TSD) FACILITIES

Form "B" (VA)  
4/1/86

Name of Facility: REHIG INTERNATIONAL  
Address: 901 NORTH LOMBARDY STREET  
RICHMOND, VA 23220  
EPA ID Number: VAD 089028377  
Facility Inspection Representative: PAUL BAUZ  
Title: PLATING MANAGER  
Telephone: (804) 355-7864

VA HWM Regs.  
Reference

1. The facility: treats, (stores), disposes  
(Circle as appropriate)
- 9.1.C.1. 2. Does the facility receive hazardous waste  
from a foreign source? Yes (No)  
  
If yes, has the facility notified the  
Commissioner of the date of arrival? N/A Yes No
- 9.1.D.(1, 2, 3) 3. Does the facility have a detailed chemical  
and physical analysis of a representative  
sample of the waste? (Yes) No
- 9.1.D.5. 4. Does the facility have a waste analysis plan  
which specifies the following: (Yes) No  
  - a) the parameters for each hazardous waste; (Yes) No
  - b) test methods for each parameter; (Yes) No
  - c) the sampling method used to obtain a  
representative sample; (Yes) No
  - d) frequency to review initial analysis. (Yes) No
- 9.1.D.6. 5. If the facility receives wastes generated  
off-site, does the plan specify procedures  
and sampling methods to ensure that the  
waste matches the identity of the waste  
designated on the accompanying manifest or  
shipping paper? N/A Yes No
- 9.1.E.1. 6. Will physical contact or disturbance of the  
waste injure unknowing persons or livestock? (Yes) No

If yes, does the TSD facility have:

- 9.1.E.2.a. a) a 24-hour surveillance system which monitors and controls entry to the active portion of the facility? ☒ Yes No
- 9.1.E.2.a.(1) b) an artificial or natural boundary which surrounds active portions of the facility? and, ☒ Yes No
- 9.1.E.2.a.(2) c) a means to control entry at all times? (i.e., gates, attendants, locked entrances, etc.) ☒ Yes No
- 9.1.E.3. d) a restricted access sign posted at each entrance to the active portion of the facility? ☒ Yes No
- Is sign legible from a distance of 25 feet? ☒ Yes No
- Is sign in English and any other foreign language predominant to the geographical area? ☒ Yes No
- 9.1.F.2.a. 7. Does the TSD facility have a written schedule for inspecting all equipment necessary for prevention, detection or response to environmental or human health hazards? ☒ Yes No
- 9.1.F.2.c. a) Does the schedule identify the types of problems which are to be looked for during the inspection? ☒ Yes No
- 9.1.F.2.d. b) Does the schedule include frequency of these inspections? ☒ Yes No
- 9.1.G.1. 8. Have the facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? ☒ Yes No
- 9.1.G.2. 9. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? ☒ Yes No
- 9.1.G.3. 10. Do personnel participate in an annual review of their initial training? ☒ Yes No
- 9.1.G.4.a. 11. Does the facility maintain a record of (a) job titles for personnel that are involved with hazardous waste management and (b) the name of the employee filling each job? ☒ Yes No

- 9.1.G.4.b. 12. Does the facility have on record a written position description for each job title noted in Question #11? ☒ Yes No
- 9.1.G.4.c. 13. Does the facility maintain a written description of the type and amount of introductory and continuing training for those employees involved in hazardous waste management? ☒ Yes No
- 9.1.G.4.d. 14. Does the facility have records to document this training? ☒ Yes No
- 9.2.B.  
9.2.D. 15. At the facility, is the following equipment installed:
- 9.2.B.1. a) An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? ☒ Yes No
- 9.2.B.2. b) A device at the scene of hazardous waste operations capable of summoning emergency assistance from Police, Fire departments, etc.? ☒ Yes No
- 9.2.B.(3, 4) c) Portable fire extinguishers, fire control, spill control, and decontamination equipment and water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system? ☒ Yes No
- 9.2.C. 16. Is a record of tests and inspections of required equipment (question 15) maintained at the facility? ☒ Yes No
- 9.2.E. 17. Does the facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? ☒ Yes No
- 9.3.A.1. 18. Does the facility have an established contingency plan to deal with any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to the air, soil, groundwater or surface water that may impact hazardous waste currently in storage at the facility? ☒ Yes No
- 9.3. 19. Does the contingency plan contain the following elements:

9.3.B.(1, 2)

- a) A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water?

☒ Yes ☐ No

9.3.B.3.

- b) A detailed description of arrangements formally agreed to by local police, fire departments, and state and local emergency teams to provide assistance during emergency situations?

☒ Yes ☐ No

9.3.B.4.  
9.3.E.

- c) A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators?  
List primary coordinator.

☒ Yes ☐ No

Name

PAUL BAUZ

Title

PLATING MANAGER

Telephone

355-7864

9.3.B.5.

- d) A list of all required emergency equipment necessary to cope with emergencies at the generator facility?

☒ Yes ☐ No

9.3.B.5.

- e) Does this list specify the location and of each item on the list, and a brief description of each item on the list, and a brief outline of its capabilities?

☒ Yes ☐ No

9.3.C.

- f) Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? List:

☒ Yes ☐ No

RICHMOND FIRE DEPT

1111 POLICE DEPT

9.3.B.

- 1) Is there documentation to indicate the personnel listed above received the contingency plan?

☒ Yes ☐ No

- 9.3.F.(9, 10) g) If the contingency plan has been implemented, was a written report filed with the Commissioner and were the Commissioner and other required authorities properly notified before operations resumed? *N/A* Yes No
- 9.3.D. 20. Have any amendments of the contingency plan been necessary? If yes, explain in comment section. Yes ☒ No
- 9.4.B.2.e. 21. Does the facility retain copies of all manifests, and inspection results for at least three years? ☒ Yes No
- 5.4.E.1. 22. Does the TSD facility receive hazardous waste from off-site generators? Yes ☒ No
- 9.4.A. If yes, has the TSD determined:
- 5.5.C.2.a. a) That manifests are completed, signed, and dated by the generator and each transporter for all shipments received *N/A* Yes No
- 5.5.C.2.b. b) That the manifest copies are signed and dated *N/A* Yes No
- 5.5.C.2.d. c) A copy has been given to the transporter *N/A* Yes No
- 5.5.C.2.e. d) A copy has been sent to the generator *N/A* Yes No
- 5.5.C.2.f. e) A copy has been retained and filed at the TSD facility. *N/A* Yes No
- 9.4.B. 23. Does the TSD facility have a written operating record which contains the following information:
- For facility receiving off-site hazardous waste:
- 9.4.B.2.a. a) A description of and the quantity of each hazardous waste received, and the method and date of treatment, storage or disposal? (Use Appendix 9.1) *N/A* Yes No
- Storage \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_
- Treatment \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_
- Disposal \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_

For facilities disposing of hazardous waste:

- 9.4.B.2.b. b) The location of each hazardous waste within the facility and the quantity at each location recorded on a map or diagram of each cell or disposal area? *N/A* Yes No

For all TSD facilities:

- 9.4.B.2.c. c) Detailed records and results of waste analyses and incineration trial tests performed on wastes coming into the facility? ☒ Yes No
- 9.4.B.2.d. d) Detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan? ☒ Yes No
- 9.4.B.2.e.  
9.1.F.4. e) Detailed records and results of inspections performed on facility emergency equipment, TSD systems, and hazardous waste areas? ☒ Yes No
- 9.4.B.2.f. f) Detailed monitoring, testing, and analytical data where required? ☒ Yes No
- 9.4.B.2.g. g) All closure cost estimates, and for disposal facilities all post-closure cost estimates? ☒ Yes No

Closure Cost Estimate \$ 8,246<sup>00</sup>

- 9.6. 24. Does the facility have a written closure plan which includes:

- 9.6.C.1.b. a) An estimate of the maximum waste inventory in storage or treatment at any time during life of facility? ☒ Yes No
- 9.6.C.1.c. b) A description of steps that will be used to decontaminate facility equipment? ☒ Yes No
- 9.6.C.1.d. c) An estimate of the expected year for closure? ☒ Yes No
- 9.6.C.1.d. d) A schedule for final closure? ☒ Yes No
- e) A copy of the closure plan given to the inspector? *ON FILE AT OFFICE* Yes ☒ No

- 9.7.C. 25. For all TSD facilities, has financial assurance for closure for this facility been established? ☒ Yes No

Instrument(s) used:

- ☐ Trust Fund
- ☐ Letter of Credit
- ☐ Performance Bond
- ☐ Financial Test
- ☒ Financial Guarantee Bond
- ☐ Certificate of Insurance
- ☐ Corporate Guarantee

26. Has a copy of all related documents been forwarded to the Virginia State Department of Health?

☒ Yes ☐ No

\* Submittal Date 5-11-85

If no, was a copy of these documents provided to the inspector? N/A

☐ Yes ☐ No

If no, will a copy of these documents be mailed to the Virginia State Department of Health? N/A

☐ Yes ☐ No

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.7.G.

27. Has liability coverage for sudden accidental occurrences\*\* been established for this facility?

☒ Yes ☐ No

Instrument(s) used:

- ☒ Certificate of Insurance
- ☐ Financial Test
- ☐ Liability Endorsement

28. Has a copy of all related documents been forwarded to the Virginia State Department of Health?

☒ Yes ☐ No

\* Submittal Date 3-21-87

\* If the financial test was used, all three (3) initially submitted items specified in § 9.7.C.5. must be updated within 90 days after the close of each succeeding fiscal year.

\*\* Sudden accidental occurrences: at least \$1 million per occurrence and \$2 million annual aggregate.

Non-sudden accidental occurrences: at least \$3 million per occurrence and \$6 million annual aggregate.



If no, was a copy of these documents provided to the inspector?

N/A

Yes No

If no, will a copy of these documents be mailed to the Virginia State Department of Health?

N/A

Yes No

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.6.H.

29. For landfills, surface impoundments, waste piles and land treatment facilities, does the facilities have a written post-closure plan that includes:

N/A

9.6.H.1.a.

a) Groundwater monitoring activities?

Yes No

9.6.H.1.b.

b) Maintenance activities to ensure containment?

Yes No

9.6.H.1.c.

c) Name, address, and phone number of contact during post-closure period?

Yes No

d) Post-closure cost estimate?

Yes No

Amount \$ \_\_\_\_\_

9.7.E.

30. For landfills, surface impoundments, waste piles and land treatment facilities, has financial assurance for post-closure care has been estimated?

N/A

Yes No

Instrument(s) used:

- \_\_\_ Trust Fund
- \_\_\_ Letter of Credit
- \_\_\_ Performance Bond
- \_\_\_ Financial Test
- \_\_\_ Financial Guarantee Bond
- \_\_\_ Certificate of Insurance
- \_\_\_ Corporate Guarantee

31. Has a copy of all related documents been forwarded to the Virginia State Department of Health?

Yes No

\* Submittal Date \_\_\_\_\_

\* If the financial test was used, all three (3) initially submitted items specified in § 9.7.C.5. must be updated within 90 days after the close of each succeeding fiscal year.

If no, was a copy of these documents provided to the inspector?

Yes No

If no, will a copy of these documents be mailed to the Virginia State Department of Health?

Yes No

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.7.G.2.

32. For landfills, surface impoundments and land treatment facilities has liability coverage\*\* for nonsudden accidental occurrences been established? *N/A*

Yes No

Instrument(s) used:

- ☐ Certificate of Insurance  
☐ Financial Test  
☐ Liability Endorsement

33. Has a copy of all related documents been forwarded to the Virginia State Department of Health?

Yes No

\* Submittal Date \_\_\_\_\_

If no, was a copy of these documents provided to the inspector?

Yes No

If no, will a copy of these documents be mailed to the Virginia State Department of Health?

Yes No

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.5.

34. For landfills, surface impoundments, wastepiles (if closed as landfills) and land treatment facilities, has a groundwater monitoring program been implemented? *N/A*

Yes No

9.4.D.

35. Has an annual report been filed?

☒ Yes No

\* If the financial test was used, all three (3) initially submitted items specified in § 9.7.C.5. must be updated within 90 days after the close of each succeeding fiscal year.

\*\* Sudden accidental occurrences: at least \$1 million per occurrence and \$2 million annual aggregate.

Non-sudden accidental occurrences: at least \$3 million per occurrence and \$6 million annual aggregate.

36. Comments:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inspector's Name: William SARNICKY

Title: CHEMICAL ENGINEER

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: 12-8-87

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

CHECKLIST FOR RCRA INSPECTION OF USE  
AND MANAGEMENT OF CONTAINERS

Name of Facility: REMIG INTERNATIONAL  
Address: 901 NORTH LOMBARD STREET  
RICHMOND, VA 23220  
EPA Generator ID Number: VAD 089028377  
Facility Inspection Representative: PAUL BAUZ  
Title: PLATING MANAGER  
Telephone Number: (804) 355-7864

The questions contained in this checklist apply to owners and operators of all hazardous waste facilities and generators accumulating less than 90 days (see § 6.4.E.1.a. that store containers of hazardous waste, except as § 9. provides otherwise.

VA HWM Regs.  
Reference

- |                        |   |                                      |        |
|------------------------|---|--------------------------------------|--------|
| 9.8.B.                 | 1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?  | <input checked="" type="radio"/> Yes | No     |
| 9.8.C.                 | 2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes? | <input checked="" type="radio"/> Yes | No     |
| 9.8.D.1.               | 3. Are all containers holding hazardous waste kept closed during storage?   | <input checked="" type="radio"/> Yes | No     |
| 9.8.E.                 | 4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week?  | <input checked="" type="radio"/> Yes | No     |
| 9.1.F.2.a.<br>9.1.F.4. | 5. Is an inspection log maintained? (See question #7 of TSD checklist.)   | <input checked="" type="radio"/> Yes | No     |
| 9.8.F.                 | 6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?  | N/A                                  | Yes No |
| 9.8.G.1.               | 7. Are incompatible wastes placed in separate containers? (See APPENDIX 9.4 for examples of incompatible waste).  | N/A                                  | Yes No |

9.8.G.3.

8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? N/A Yes No

9. Comments:

79 DRUMS IN STORAGE AREA ON 12/8/87  
79 x 425 = 33,575 lbs  
Company HAS INTERIM STATUS TO STORE 91 DRUMS MAXIMUM

Inspector's Name: \_\_\_\_\_

WILLIAM SARNECKY

Title: \_\_\_\_\_

CHEMICAL ENGINEER

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

12-8-87

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection - *Rehug International, Richmond VA*  
*VAD089028377*

DATE: 10/16/86

FROM: Traci I. Self, Environmental Engineer *TSS*  
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

TO: FILE

THRU: John A. Armstead, Chief  
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS  
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE  
VIOLATIONS.

*Class II - CLPC - No schedule for closure*

*Class II - CLPC - Incomplete Training Records*



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF WASTE MANAGEMENT

11th Floor, Monroe Building

101 N. 14th Street

Richmond, Va. 23219

Larry E. Lewis  
Rehrig International  
901 North Lombardy Street  
Richmond, VA 23220

OCT 08 1986

CERTIFIED-RETURN  
RECEIPT REQUESTED

Dear Mr. Lewis:

On September 24, 1986 your facility was reinspected in accordance with the Virginia Hazardous Waste Management Regulations (VHWMR). During this visit it was noted that the facility had made significant improvements in complying with hazardous waste requirements; however, there are still a few areas that are not in total compliance with the Regulations. These deficiencies are indicated on the enclosed checklists.

Please take the appropriate corrective action for bringing your facility in total compliance with the regulations by November 10, 1986.

Thank you for your cooperation during this visit. If you have any questions regarding this matter please call me at (804) 225-2667.

Sincerely,

A handwritten signature in cursive script that reads "Renee C. Tyson".

Renee C. Tyson, Chemist  
Bureau of Hazardous Waste Management

Enclosure

SURVEY SHEET

7/1/86

Name of Facility: Rehrig International

Address: 901 North Lombardy Street  
Richmond, Virginia 23220

EPA Generator ID Number: VAD089028377

Facility Inspection Representative: Paul Bouz

Title: Plating Manager

Telephone Number: (804) 355-7804

1. What is business activity of firm? (i.e., furniture mfg., metal plating, recycling, etc.) manufacture shopping carts

2. Give brief description of waste stream(s) and code designation(s). Food  
Nickel-chrome plating sludge.

3. List the amounts of hazardous waste generated, recycled and accumulated.

[illegible]

- a. Characteristic - Ignitable (D001)  
Corrosive (D002)  
Reactive (D003)  
EP Toxic (D004-  
D017)

- b. Listed (F, K, or U list) *Foot*

- c. Listed (P)

- d. Waste from spills of P and U list



4. Based on the above information, the company is classified as:
- a. Small quantity generator exempt from regulations. (Form C)
  - b. Recycler not exempt from regulations. (Form A)
  - c. Generator. (Form A)
5. If facility treats, stores or disposes on-site complete Form B (unless exempt under § 9.).
6. Complete the appropriate checklists.

Container (Form I)

Surface Impoundment (Form K)

Landfill (Form N)

Tank (Form J)

Incineration & Thermal

Treatment (Form O & P)

Physical, Chemical & Biological

Treatment (Form Q)

7. Comments:

Inspector's Name: BENEE C. Tyson

Title: Chemist

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: 9/24/86

Survey

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

CHECKLIST FOR RCRA INSPECTION OF GENERATORS

Name of Facility: Rehrig International  
Address: 901 North Lombardy Street  
Richmond, Virginia 23220  
EPA Generator ID Number: VAD089028377  
Facility Inspection Representative: Bul Bauz  
Title: Planting Manager  
Telephone Number: (804) 355-7864

VA HWM Regs.  
Reference:

- 6.3
1. Is a manifest system currently used by the generator so that off-site shipment of hazardous wastes can be tracked? ☒ Yes ☐ No
  2. Is the following included on the generators manifest?
    - 5.3.B.1. a) The generator's name, address, telephone number and EPA ID number. ☒ Yes ☐ No
    - 5.3.B.2. b) A unique five digit number assigned to this manifest by the generator. ☒ Yes ☐ No
    - 5.3.B.3. c) Total number of pages used to complete the manifest. ☒ Yes ☐ No
    - 5.3.B.4. d) The company name and EPA identification of each transporter. ☒ Yes ☐ No
    - 5.3.B.5. e) The company name, site address and the EPA ID number of the facility designated to receive the waste listed on the manifest. ☒ Yes ☐ No
    - 5.3.B.6. f) The U.S. DOT description of each waste to include its proper shipping name, hazard class, and ID number (UN/NA), as identified in the Virginia Regulations Governing the Transportation of Hazardous Materials. ☒ Yes ☐ No

- 5.3.B.7. g) The units of weight or volume and the type and number of containers loaded in the transport vehicle included on the manifest form? ☒ Yes No
- 5.3.B.8. h) In case of international shipment, the point of departure (city & state) for those shipments destined for treatment, storage, and disposal outside the jurisdiction of the United States. ☒ Yes No
- 5.3.C. i) The following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature.
- "I hereby declare that the content of this consignment are fully and accurately described above by proper shipping name and are classified packed, marked, and labeled, and condition for transport by [mode of transportation] according to applicable international and national governmental regulations."
- ☒ Yes No
- 6.5.C.2. 3. Have manifest been received from TSD for waste shipped over 45 days ago. ☒ Yes No
- if not,
- has the generator filed an exception report? ☒ Yes No
- 5.5.A.7. 4. Did the generator determine that the transporter has a Virginia transporter permit? ☒ Yes No
- 6.4.E.1. 5. Is hazardous waste being accumulated on-site by the generator for less than 90 days? If yes, *N/A (Interim status for storage in containers)* Yes No
- 6.4.E.1.a. a) Is the waste placed in either containers or tanks? (If yes, fill out appropriate checklist. If no, TSD permit is required.) ☒ Yes No
- 6.4.E.1.b. b) Is the date accumulation of waste began clearly and visibly marked on each container and, does it indicate accumulation for less than 90 days? *N/A* Yes No

- 6.4.E.1.c. c) During accumulation, are the storage containers and/or tank clearly labeled with the words Hazardous Waste? *N/A* Yes No
- 9.1.G.1. 6. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? ☒ Yes No
- 9.1.G.2. 7. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? *this should be documented in your training outline* ☒ Yes No
- 9.1.G.3. 8. Do personnel participate in an annual review of their initial training? ☒ Yes No
- 9.1.G.4.a. 9. Does the facility maintain a record of:
- (a) job titles for personnel that are involved with hazardous waste management; and *Plant Manager not included* Yes ☒ No ✓
- (b) the name of the employee filling each job? *Plant Manager not included* Yes ☒ No ✓
- 9.1.G.4.b. 10. Does the facility have on record a written position description for each job title noted in Question #9? *Plant Manager not included* Yes ☒ No ✓
- 9.1.G.4.c. 11. Does the facility maintain a written description of the type and amount of introductory and continuing training for those employees involved in hazardous waste management? *Plant Manager not included,* Yes ☒ No ✓
- 9.1.G.4.d. 12. Does the facility have records to document this training? *Please develop a training outline, no records for plant manager.* Yes ☒ No ✓
- 9.2.B.  
9.2.D. 13. At the facility, is the following equipment installed:
- 9.2.B.1. a) An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? ☒ Yes No

- 9.2.B.2.                    b) A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.? ☒ Yes ☐ No
- 9.2.B.(3, 4)                c) Portable fire extinguishers, fire control, spill control, and decontamination equipment and water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system? ☒ Yes ☐ No
- 9.2.C.                    14. Is a record of tests and inspections of required equipment (question 11) maintained at the facility? ☒ Yes ☐ No
- 9.2.F.                    15. Does the facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? ☒ Yes ☐ No
- 9.3.A.1.  
6.4.E.1.d.                16. Does the facility have an established contingency plan to deal with any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to the air, soil, groundwater or surface water? ☒ Yes ☐ No
- 9.3.                    17. Does the contingency plan contain the following elements:
- 9.3.B.(1, 2)                a) A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water? ☒ Yes ☐ No
- 9.3.B.4.                    b) A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators? ☒ Yes ☐ No  
List primary coordinator.

Name Paul Cruz

Title Plant Manager

Telephone 355-7864

9.3.B.5. c) A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? ☒ Yes No

9.3.B.5. d) Does this list specify the location and physical description of each item on the list and a brief description of each item on the list, and a brief outline of its capabilities. Yes ☒ No ✓

9.3.B.6. e) An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? ☒ Yes No

9.3.C. f) Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? List: ☒ Yes No

Richmond Fire Dept.

9.3.B. 1) Is there documentation to indicate the personnel listed above received the contingency plan? ☒ Yes No

9.3.F.(9, 10) g) If the contingency plan has been implemented, was a written report filed with the Commissioner and were the Commissioner and other required authorities properly notified before operations resumed? *N/A* Yes No

6.5.A. 18. Does the facility retain copies of all manifests, annual reports, and test results for at least three years? *Facility has developed a hazardous waste notebook to keep all paperwork* ☒ Yes No

6.5.B. 19. Has the facility submitted an annual report for the preceding calendar year? ☒ Yes No

20. Comments

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Inspector's Name: RENEE C. TYSON

Title: Chemist

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: 9/24/80

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_



CHECKLIST FOR RCRA INSPECTION OF TREATMENT,  
STORAGE & DISPOSAL (TSD) FACILITIES

Form "B" (VA)  
7/1/86

Name of Facility: Rehrig International  
Address: 901 North Lombardy Street  
Richmond, Virginia 23220  
EPA ID Number: VAD089028377  
Facility Inspection Representative: Bul Bauz  
Title: Plating Manager  
Telephone: (804) 355-7864

VA HWM Regs.  
Reference

1. The facility: treats, (stores), disposes  
(Circle as appropriate)
- 9.1.C.1. 2. Does the facility receive hazardous waste from a foreign source? Yes (No)  
If yes, has the facility notified the Executive Director of the date of arrival? Yes No
- 9.1.D.(1, 2, 3) 3. Does the facility have a detailed chemical and physical analysis of a representative sample of the waste? (Yes) No
- 9.1.D.5. 4. Does the facility have a waste analysis plan which specifies the following:  
a) the parameters for each hazardous waste; (Yes) No  
b) test methods for each parameter; (Yes) No  
c) the sampling method used to obtain a representative sample; (Yes) No  
d) frequency to review initial analysis. (Yes) No
- 9.1.D.6. 5. If the facility receives wastes generated off-site, does the plan specify procedures and sampling methods to ensure that the waste matches the identity of the waste designated on the accompanying manifest or shipping paper? N/A Yes No
- 9.1.E.1. 6. Will physical contact or disturbance of the waste injure unknowing persons or livestock? (Yes) No  
If yes, does the TSD facility have:

- 9.1.E.2.a. a) a 24-hour surveillance system which monitors and controls entry to the active portion of the facility? ☒ Yes No
- 9.1.E.2.a.(1) b) an artificial or natural boundary which surrounds active portions of the facility? and, ☒ Yes No
- 9.1.E.2.a.(2) c) a means to control entry at all times? (i.e., gates, attendants, locked entrances, etc.) ☒ Yes No
- 9.1.E.3. d) a restricted access sign posted at each entrance to the active portion of the facility? ☒ Yes No
- Is sign legible from a distance of 25 feet? ☒ Yes No
- Is sign in English and any other foreign language predominant to the geographical area? ☒ Yes No
- 9.1.F.2.a. 7. Does the TSD facility have a written schedule for inspecting all equipment necessary for prevention, detection or response to environmental or human health hazards? ☒ Yes No
- 9.1.F.2.c. a) Does the schedule identify the types of problems which are to be looked for during the inspection? ☒ Yes No
- 9.1.F.2.d. b) Does the schedule include frequency of these inspections? ☒ Yes No
- 9.1.G.1. 8. Have the facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? ☒ Yes No
- 9.1.G.2. 9. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? *This should be documented in the training outline.* ☒ Yes No
- 9.1.G.3. 10. Do personnel participate in an annual review of their initial training? ☒ Yes No
- 9.1.G.4.a. 11. Does the facility maintain a record of (a) job titles for personnel that are involved with hazardous waste management and (b) the name of the employee filling each job? *Manager not included* Yes ☒ No ✓

- 9.1.G.4.b. 12. Does the facility have on record a written position description for each job title noted in Question #11? *Plating Manager not included* Yes ☒ No
- 9.1.G.4.c. 13. Does the facility maintain a written description of the type and amount of introductory and continuing training for those employees involved in hazardous waste management? *Plating manager not included* Yes ☒ No
- 9.1.G.4.d. 14. Does the facility have records to document this training? *Please develop a training outline, no records for plating Manager* Yes ☒ No
- 9.2.B.  
9.2.D. 15. At the facility, is the following equipment installed:
- 9.2.B.1. a) An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? ☒ Yes No
- 9.2.B.2. b) A device at the scene of hazardous waste operations capable of summoning emergency assistance from Police, Fire departments, etc.? ☒ Yes No
- 9.2.B.(3, 4) c) Portable fire extinguishers, fire control, spill control, and decontamination equipment and water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system? ☒ Yes No
- 9.2.C. 16. Is a record of tests and inspections of required equipment (question 15) maintained at the facility? ☒ Yes No
- 9.2.E. 17. Does the facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? ☒ Yes No
- 9.3.A.1. 18. Does the facility have an established contingency plan to deal with any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to the air, soil, groundwater or surface water that may impact hazardous waste currently in storage at the facility? ☒ Yes No
- 9.3. 19. Does the contingency plan contain the following elements:

9.3.B.(1, 2)

- a) A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water?

☒ Yes

No

9.3.B.3.

- b) A detailed description of arrangements formally agreed to by local police, fire departments, and state and local emergency teams to provide assistance during emergency situations?

☒ Yes

No

9.3.B.4.

9.3.E.

- c) A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators?  
List primary coordinator.

☒ Yes

No

Name Bul Baurz

Title Plant Manager

Telephone 355-7864

9.3.B.5.

- d) A list of all required emergency equipment necessary to cope with emergencies at the generator facility?

☒ Yes

No

9.3.B.5.

- e) Does this list specify the location and of each item on the list, and a brief description of each item on the list, and a brief outline of its capabilities?

Yes

☒ No

9.3.C.

- f) Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? List:

☒ Yes

No

Richmond Fire Dept.

9.3.B.

- 1) Is there documentation to indicate the personnel listed above received the contingency plan?

☒ Yes

No

9.3.F.(9, 10)

g) If the contingency plan has been implemented, was a written report filed with the Executive Director and were the Executive Director and other required authorities properly notified before operations resumed? *N/A*

Yes No

9.3.D.

20. Have any amendments of the contingency plan been necessary? If yes, explain in comment section.

Yes ☒ No

9.4.B.2.e.  
5.4.E.1.

21. Does the facility retain copies of all manifests, and inspection results for at least three years?

☒ Yes No

22. Does the TSD facility receive hazardous waste from off-site generators?

Yes ☒ No

9.4.A.

If yes, has the TSD determined:

5.5.C.2.a.

a) That manifests are completed, signed, and dated by the generator and each transporter for all shipments received

Yes No

5.5.C.2.b.

b) That the manifest copies are signed and dated

Yes No

5.5.C.2.d.

c) A copy has been given to the transporter

Yes No

5.5.C.2.e.

d) A copy has been sent to the generator

Yes No

5.5.C.2.f.

e) A copy has been retained and filed at the TSD facility.

Yes No

9.4.B.

23. Does the TSD facility have a written operating record which contains the following information: *N/A*

For facility receiving off-site hazardous waste: *N/A*

9.4.B.2.a.

a) A description of and the quantity of each hazardous waste received, and the method and date of treatment, storage or disposal? (Use Appendix 9.1)

Yes No

Storage \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_

Treatment \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_

Disposal \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_

For facilities disposing of hazardous waste:

- 9.4.B.2.b.                      b) The location of each hazardous waste within the facility and the quantity at each location recorded on a map or diagram of each cell or disposal area? N/A      Yes      No

For all TSD facilities:

- 9.4.B.2.c.                      c) Detailed records and results of waste analyses and incineration trial tests performed on wastes coming into the facility? N/A      Yes      No

- 9.4.B.2.d.                      d) Detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan?      Yes      No

- 9.4.B.2.e.  
9.1.F.4.                      e) Detailed records and results of inspections performed on facility emergency equipment, TSD systems, and hazardous waste areas?      Yes      No

- 9.4.B.2.f.                      f) Detailed monitoring, testing, and analytical data where required?      Yes      No

- 9.4.B.2.g.                      g) All closure cost estimates, and for disposal facilities all post-closure cost estimates?      Yes      No

Closure Cost Estimate \$ 9,900

- 9.6.                      24. Does the facility have a written closure plan which includes:

- 9.6.C.1.b.                      a) An estimate of the maximum waste inventory in storage or treatment at any time during life of facility?      Yes      No

- 9.6.C.1.c.                      b) A description of steps that will be used to decontaminate facility equipment?      Yes      No

- 9.6.C.1.d.                      c) An estimate of the expected year for closure?      Yes      No

- 9.6.C.1.d.                      d) A schedule for final closure?      Yes      No ✓

- e) A copy of the closure plan given to the inspector?      Yes      No

- 9.7.C.                      25. For all TSD facilities, has financial assurance for closure for this facility been established?      Yes      No

Instrument(s) used:

- ☐ Trust Fund
- ☐ Letter of Credit
- ☐ Performance Bond
- ☐ Financial Test
- ☒ Financial Guarantee Bond
- ☐ Certificate of Insurance
- ☐ Corporate Guarantee

26. Has a copy of all related documents been forwarded to the Virginia State Department of Health?

☒ Yes ☐ No

\* Submittal Date \_\_\_\_\_

If no, was a copy of these documents provided to the inspector?

Yes ☐ No ☐

If no, will a copy of these documents be mailed to the Virginia State Department of Health?

Yes ☐ No ☐

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.7.G.

27. Has liability coverage for sudden accidental occurrences\*\* been established for this facility?

☒ Yes ☐ No

Instrument(s) used:

- ☒ Certificate of Insurance
- ☐ Financial Test
- ☐ Liability Endorsement

28. Has a copy of all related documents been forwarded to the Virginia State Department of Health?

Yes ☐ No ☐

\* Submittal Date \_\_\_\_\_

\* If the financial test was used, all three (3) initially submitted items specified in § 9.7.C.5. must be updated within 90 days after the close of each succeeding fiscal year.

\*\* Sudden accidental occurrences: at least \$1 million per occurrence and \$2 million annual aggregate.

Non-sudden accidental occurrences: at least \$3 million per occurrence and \$6 million annual aggregate.

If no, was a copy of these documents provided to the inspector?

Yes No

If no, will a copy of these documents be mailed to the Virginia State Department of Health?

Yes No

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.6.H. 29. For landfills, surface impoundments, waste piles and land treatment facilities, does the facilities have a written post-closure plan that includes: *N/A*

9.6.H.1.a. a) Groundwater monitoring activities? Yes No

9.6.H.1.b. b) Maintenance activities to ensure containment? Yes No

9.6.H.1.c. c) Name, address, and phone number of contact during post-closure period? Yes No

d) Post-closure cost estimate? Yes No

Amount \$ \_\_\_\_\_

9.7.E. 30. For landfills, surface impoundments, waste piles and land treatment facilities, has financial assurance for post-closure care has been estimated? *N/A*

Yes No

Instrument(s) used:

- ☐ Trust Fund
- ☐ Letter of Credit
- ☐ Performance Bond
- ☐ Financial Test
- ☐ Financial Guarantee Bond
- ☐ Certificate of Insurance
- ☐ Corporate Guarantee

31. Has a copy of all related documents been forwarded to the Virginia State Department of Health? *N/A*

Yes No

\* Submittal Date \_\_\_\_\_

\* If the financial test was used, all three (3) initially submitted items specified in § 9.7.C.5. must be updated within 90 days after the close of each succeeding fiscal year.



If no, was a copy of these documents provided to the inspector?

Yes No

If no, will a copy of these documents be mailed to the Virginia State Department of Health?

Yes No

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.7.G.2.

32. For landfills, surface impoundments and land treatment facilities has liability coverage\*\* for nonsudden accidental occurrences been established? N/A

Yes No

Instrument(s) used:

- ☐ Certificate of Insurance  
☐ Financial Test  
☐ Liability Endorsement

33. Has a copy of all related documents been forwarded to the Virginia State Department of Health? N/A

Yes No

\* Submittal Date \_\_\_\_\_

If no, was a copy of these documents provided to the inspector?

Yes No

If no, will a copy of these documents be mailed to the Virginia State Department of Health?

Yes No

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.5.

34. For landfills, surface impoundments, wastepiles (if closed as landfills) and land treatment facilities, has a groundwater monitoring program been implemented? N/A

Yes No

9.4.D.

35. Has an annual report been filed?

Yes No

\* If the financial test was used, all three (3) initially submitted items specified in § 9.7.C.5. must be updated within 90 days after the close of each succeeding fiscal year.

\*\* Sudden accidental occurrences: at least \$1 million per occurrence and \$2 million annual aggregate.

Non-sudden accidental occurrences: at least \$3 million per occurrence and \$6 million annual aggregate.

36. Comments:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inspector's Name: BENEE C. Tyson

Title: Chemist

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: 9/24/86

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

CHECKLIST FOR RCRA INSPECTION OF USE  
AND MANAGEMENT OF CONTAINERS

Name of Facility: Rebrig International  
Address: 901 North Lombardy Street  
Richmond, Virginia 23220  
EPA Generator ID Number: VAD089028377  
Facility Inspection Representative: Paul Ruiz  
Title: Planting Manager  
Telephone Number: (804) 355-7844

The questions contained in this checklist apply to owners and operators of all hazardous waste facilities and generators accumulating less than 90 days (see § 6.4.E.1.a. that store containers of hazardous waste, except as § 9. provides otherwise.

VA HWM Regs.  
Reference

- |                        |   |                                      |    |
|------------------------|---|--------------------------------------|----|
| 9.8.B.                 | 1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?  | <input checked="" type="radio"/> Yes | No |
| 9.8.C.                 | 2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes? | <input checked="" type="radio"/> Yes | No |
| 9.8.D.1.               | 3. Are all containers holding hazardous waste kept closed during storage?   | <input checked="" type="radio"/> Yes | No |
| 9.8.E.                 | 4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week?  | <input checked="" type="radio"/> Yes | No |
| 9.1.F.2.a.<br>9.1.F.4. | 5. Is an inspection log maintained? (See question #7 of TSD checklist.)   | <input checked="" type="radio"/> Yes | No |
| 9.8.F.                 | 6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?  | <input checked="" type="radio"/> Yes | No |
| 9.8.G.1.               | 7. Are incompatible wastes placed in separate containers? (See APPENDIX 9.4 for examples of incompatible waste). <u>N/A</u>   | Yes                                  | No |

9.8.G.3.

8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? *N/A*

Yes No

9. Comments:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inspector's Name:

*RENEE C. Tyson*

Title:

*Chemist*

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection:

*9/26/86*

Inspector's Name:

Title:

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection:

**JULY 26, 1986**

**LETTER FROM COMMONWELTH OF VIRGINIA DEPARTMENT OF HEALTH TO  
REHRIG INTERNATIONAL**



# COMMONWEALTH of VIRGINIA

*Department of Health*  
*Richmond, Va. 23219*

JAMES B. KENLEY, M.D.  
COMMISSIONER

Certified Mail  
Return Receipt Requested

Virginia: The State Board of Health

Re: Rehrig International, Inc.  
VAD089028377

## Compliance Order

### SECTION A: Findings

1. Rehrig International, Inc. (herein after called the corporation) is the owner and operator of a business in Richmond, Virginia for which a "Notification of Hazardous Waste Activity" was filed with the U.S. Environmental Protection Agency (EPA) on November 4, 1980 declaring that Rehrig International, Inc. is a generator and storer of hazardous waste listed or identified under Title 40, Code of Federal Regulations (CFR), Part 261.
2. Rehrig International, Inc. filed "Part A" of an application for a permit to treat, store, or dispose of hazardous waste on November 11, 1980, with the U.S. Environmental Protection Agency. In the application, the corporation proposed to store a maximum of 5,000 gallons of hazardous waste in drums.
3. The Bureau of Hazardous Waste Management sent the corporation a letter dated July 23, 1984, which stated the requirements for liability coverage for owners/operators of hazardous waste management facilities. An audit of Bureau files in November, 1984 indicated that Rehrig has not complied with financial requirements for hazardous waste management facilities in accordance with Section 9.08 of the Virginia Hazardous Waste Management Regulations (VHWMR).
4. The Virginia Department of Health, through the formal authorization published on November 3, 1981 in the Federal Register has been given the authority to implement its own regulations in lieu of the sections of 40 CFR promulgated under the Resource Conservation and Recovery Act. Additionally, based on the pertinent sections of Title 32.1, Code of Virginia (1950), as amended, the Department has general responsibility for administration of Virginia statutes and regulations related to hazardous waste management.

SECTION B:

1. In accordance with Section 3006(c) of the Resource Conservation and Recovery Act, the Commonwealth of Virginia has been granted interim authorization for Phase I and Phase II Components A, B, and C to operate its hazardous waste program in lieu of the Federal hazardous waste program as published in the Federal Register on November 3, 1981, August 17, 1983, and December 18, 1984 respectively.
2. The State Board of Health is assigned responsibility for general supervision and control of hazardous waste management activities under Section 32.1-178 of the Code of Virginia (1950), as amended. This responsibility specifically includes the promulgation of regulations. Section 32.1-180 of the Code requires that no person treat, store, dispose or transport hazardous waste without a permit from the Commissioner.
3. The State Board of Health has promulgated regulations controlling the generation and management of hazardous wastes entitled, "Commonwealth of Virginia, State Board of Health, Hazardous Waste Management Regulations". These regulations became effective May 21, 1981 with subsequent amendments effective October 1, 1981, December 1, 1982, July 1, 1983, November 1, 1983, September 20, 1984, and October 1, 1984.
4. Section 1.04.03 of the Virginia Hazardous Waste Management Regulations (VHWMR) requires all persons who generate, transport, treat, store, or dispose of hazardous waste to comply with the provisions of these regulations.
5. Sections 32.1-26 and 32.1-27 of the Code of Virginia (1950), as amended, authorize the Board of Health to issue orders directing compliance with any provision of law or regulation of the Board. Orders of the Board are enforceable pursuant to Sections 32.1-27 and 32.1-186 of the Code.
6. The State Health Commissioner is the chief executive officer of the Virginia Department of Health and the principal agent of the State Board of Health. The Commissioner is empowered to act with the authority of the Board when it is not in session.

SECTION C: Order

1. The corporation shall comply with the Virginia Hazardous Waste Management Regulations (VHWMR).

2. By March 4, 1985, the corporation shall deliver to the Bureau of Hazardous Waste Management documentation of compliance with financial requirements for sudden liability and closure cost in accordance with Section 9.08 of the VHWMR.

3. By March 1, 1985, the corporation shall deliver to the Bureau of Hazardous Waste Management an annual report for calendar year 1984 in accordance with Section 9.05.04 of the VHWMR.

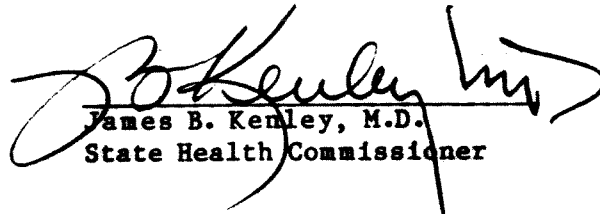
SECTION D: Stipulations

1. For the purposes of this proceeding, the corporation admits the jurisdictional and factual allegations contained herein.

2. For the purposes of this proceeding, the corporation waives the right to request further hearing on any issue of fact or law herein.

3. The corporation declares that fair and due process under the Administrative Process Act, Title 9, Chapter 1.1:1, Sections 9-6.14 has been received.

This is an Order of the State Board of Health and the State Health Commissioner in accordance with Title 32.1, Code of Virginia (1950), as amended.

  
James B. Kenley, M.D.  
State Health Commissioner



The foregoing instrument was acknowledged before me this 26<sup>th</sup> day of December, 1984, by James B. Kenley.

My commission expires:

July 26, 1986

Theresa F. Boyce  
Notary Public

Seen and Agreed to:

Larry E. Lewis, Controller

Larry E. Lewis, Controller  
Rehrig International, Inc.  
901 North Lombardy Street  
Richmond, Virginia 23220

SLM2:1697/smm

**JULY 30, 1986**

**RCRA INSPECTION**



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF WASTE MANAGEMENT

11th Floor, Monroe Building  
101 N. 14th Street  
Richmond, Va. 23219

JUL 30 1986

CERTIFIED - RETURN  
RECEIPT REQUESTED

Mr. Larry E. Lewis  
Rehrig International  
901 North Lombardy Street  
Richmond, VA 23229

Dear Mr. Lewis:

On June 25, 1986 your facility was reinspected in accordance with the Virginia Hazardous Waste Management Regulations (VHWMR). During this visit it was noted that again your facility was not in compliance with the regulations. These deficiencies are indicated by the red markings on the enclosed inspection checklists.

According to your records, these violations were brought to your attention in letters dated April 23, 1985 and January 17, 1986 as a result of inspections conducted on March 22, 1985 and December 19, 1985. To again clarify those areas of non-compliance I have listed your deficiencies below. You need to:

1. Acquire a current detailed chemical and physical analysis of a representative sample of your hazardous waste.
2. Establish a written waste analysis plan which specifies the following:
  - a. the parameter for each hazardous waste,
  - b. test methods for each parameter,
  - c. the sampling method used to obtain a representative sample, and
  - d. frequency to review analysis.
3. Maintain a written inspection schedule for inspecting all equipment necessary for prevention, detection or response to environmental or human health hazards, identifying the types of problems which are to be looked for during the inspection.
4. Establish an outline or written description of the training program offered to new employees involved with hazardous waste management at the facility.

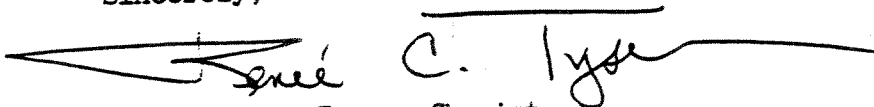
Mr. Larry E. Lewis  
Page 2

5. State and document in the written training description that all new employees will successfully complete the training mentioned above within 6-months of employment.
6. Maintain a record of names, job titles and job description of all personnel involved with hazardous waste management. Document dates for annual reviews as well as initial and continuing training.
7. Establish a hazardous waste contingency plan that addresses spills. The plan should include detailed description of emergency procedures facility personnel will implement in case of spill or any other unplanned release.
8. Describe arrangements formally agreed to by local authorities who will provide assistance during an emergency situation.
9. Emergency equipment lists should include the locations of all equipment.
10. Send copies of the contingency plan to local police, fire departments and hospitals who will provide assistance during an emergency. Document that the agencies listed above received the plan.
11. Retain copies of all manifest, test results inspection results and annual reports for at least three years.
12. Establish a closure cost estimate consistent with the information and maximum quantities listed in your Part A application and closure plan. The alternative is to amend your Part A application and closure plan to be consistent with figures used in establishing your closure cost estimate. These three documents (Part A application, closure plan, and closure cost estimate) must use the same quantity for maximum amount of hazardous waste in storage at any time.
13. Include description of steps that will be used to decontaminate the facility equipment and a schedule for final closure in facility closure plan.

Please take the appropriate corrective action for bringing your facility into total compliance by September 2, 1986. A reinspection will follow shortly after this date.

If you have any questions regarding this matter, please call me at (804) 225-2667.

Sincerely,



Renee Cheryl Tyson, Chemist  
Bureau of Hazardous Waste Management

Enclosure

# SURVEY SHEET

4/1/86

Name of Facility: Behrig International

Address: 901 North Lombardy Street

Richmond, Virginia 23227

EPA Generator ID Number: VAD089028377

Facility Inspection Representative: Bruce Bantz

Title: Plating Manager

Telephone Number: (904) 355-7864

1. What is business activity of firm? (i.e., furniture mfg., metal plating, recycling, etc.) manufacture shopping carts

2. Give brief description of waste stream(s) and code designation(s). (FDDH) (T)

Nickel-chrome plating sludge.

3. List the amounts of hazardous waste generated, recycled and accumulated.

a. Characteristic - Ignitable (D001)  
Corrosive (D002)  
Reactive (D003)  
EP Toxic (D004-  
p017)

- b. Listed (F, K, or U list) *FODL*

- c. Listed (P)

- d. Waste from spills of P and U list

(1) Total Generated #/mo	(2) Total Recycled #/mo	(3) Difference #/mo (1) minus (2)	(4) Total Regulated #/mo (1) or (3)	(5) Total Accumulated
205 kg			14,175 kg	

4. Based on the above information, the company is classified as:

a. Small quantity generator exempt from regulations. (Form C)

b. Recycler not exempt from regulations. (Form A)

c. Generator. (Form A)

5. If facility treats, stores or disposes on-site complete Form B (unless exempt under § 9.).

6. Complete the appropriate checklists.

Container (Form I)

Surface Impoundment (Form K)

Landfill (Form N)

Tank (Form J)

Incineration & Thermal

Treatment (Form O & P)

Physical, Chemical & Biological

Treatment (Form Q)

7. Comments:

Inspector's Name:

RENEE' C. TYSON

Title:

Chemist

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection:

6/25/86

Survey

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

CHECKLIST FOR RCRA INSPECTION OF GENERATORS

Name of Facility: Rehrig International  
Address: 901 North Lombardy Street  
Richmond, Va. 23227  
EPA Generator ID Number: VAD089028377  
Facility Inspection Representative: Paul Bauz  
Title: Planting Manager  
Telephone Number: (804) 355-7864

VA HWM Regs.  
Reference:

- 6.3 1. Is a manifest system currently used by the generator so that off-site shipment of hazardous wastes can be tracked? ☒ Yes No
2. Is the following included on the generators manifest?
- 5.3.B.1. a) The generator's name, address, telephone number and EPA ID number. ☒ Yes No
- 5.3.B.2. b) A unique five digit number assigned to this manifest by the generator. ☒ Yes No
- 5.3.B.3. c) Total number of pages used to complete the manifest. ☒ Yes No
- 5.3.B.4. d) The company name and EPA identification of each transporter. ☒ Yes No
- 5.3.B.5. e) The company name, site address and the EPA ID number of the facility designated to receive the waste listed on the manifest. ☒ Yes No
- 5.3.B.6. f) The U.S. DOT description of each waste to include its proper shipping name, hazard class, and ID number (UN/NA), as identified in the Virginia Regulations Governing the Transportation of Hazardous Materials. ☒ Yes No



- 5.3.B.7. g) The units of weight or volume and the type and number of containers loaded in the transport vehicle included on the manifest form? ☒ Yes No
- 5.3.B.8. h) In case of international shipment, the point of departure (city & state) for those shipments destined for treatment, storage, and disposal outside the jurisdiction of the United States. *N/A* Yes No
- 5.3.C. i) The following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature.
- "I hereby declare that the content of this consignment are fully and accurately described above by proper shipping name and are classified packed, marked, and labeled, and condition for transport by [mode of transportation] according to applicable international and national governmental regulations." ☒ Yes No
- 6.5.C.2. 3. Have manifest been received from TSD for waste shipped over 45 days ago. ☒ Yes No
- if not,
- has the generator filed an exception report? ☒ Yes No
- 5.5.A.7. 4. Did the generator determine that the transporter has a Virginia transporter permit? ☒ Yes No
- 6.4.E.1. 5. Is hazardous waste being accumulated on-site by the generator for less than 90 days? If yes, *N/A* *(Interim Status for storage in containers)* Yes No
- 6.4.E.1.a. a) Is the waste placed in either containers or tanks? (If yes, fill out appropriate checklist. If no, TSD permit is required.) Yes No
- 6.4.E.1.b. b) Is the date accumulation of waste began clearly and visibly marked on each container and, does it indicate accumulation for less than 90 days? Yes No

Form "A"

- 6.4.E.1.c. c) During accumulation, are the storage containers and/or tank clearly labeled with the words Hazardous Waste? Yes No
- 9.1.G.1. 6. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? ☒ Yes No
- 9.1.G.2. 7. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? *This should be stated in your training outline.* Yes No
- 9.1.G.3. 8. Do personnel participate in an annual review of their initial training? *Did not have an annual review in 1985.* Yes ☒ No
- 9.1.G.4.a. 9. Does the facility maintain a record of:
- (a) job titles for personnel that are involved with hazardous waste management; and *Still have not included all employees involved in haz. waste mgmt.* Yes ☒ No
- (b) the name of the employee filling each job? Yes ☒ No
- 9.1.G.4.b. 10. Does the facility have on record a written position description for each job title noted in Question #9? Yes ☒ No
- 9.1.G.4.c. 11. Does the facility maintain a written description of the type and amount of introductory and continuing training for those employees involved in hazardous waste management? Yes ☒ No
- 9.1.G.4.d. 12. Does the facility have records to document this training? Yes ☒ No
- 9.2.B.  
9.2.D. 13. At the facility, is the following equipment installed:
- 9.2.B.1. a) An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? ☒ Yes No

- 9.2.B.2.                      b) A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.? ☒ Yes ☐ No
- 9.2.B.(3, 4)                      c) Portable fire extinguishers, fire control, spill control, and decontamination equipment and water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system? ☒ Yes ☐ No
- 9.2.C.                      14. Is a record of tests and inspections of required equipment (question 11) maintained at the facility? ☒ Yes ☐ No
- 9.2.F.                      15. Does the facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? ☒ Yes ☐ No
- 9.3.A.1.  
6.4.E.1.d.                      16. Does the facility have an established contingency plan to deal with any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to the air, soil, groundwater or surface water? ☐ Yes ☒ No
- 9.3.                      17. Does the contingency plan contain the following elements:
- 9.3.B.(1, 2)                      a) A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water? *still have not addressed spill procedures.* ☐ Yes ☒ No
- 9.3.B.4.                      b) A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators? ☒ Yes ☐ No  
List primary coordinator.

Name

Bul Bauz

Title

Planting Manager

Telephone

355-7864

9.3.B.5. c) A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? ☒ Yes ☐ No

9.3.B.5. d) Does this list specify the location and physical description of each item on the list and a brief description of each item on the list, and a brief outline of its capabilities. ☐ Yes ☒ No

9.3.B.6. e) An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? ☒ Yes ☐ No

9.3.C. f) Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? List: ☒ Yes ☐ No

Richmond Police  
" Fire

9.3.B. 1) Is there documentation to indicate the personnel listed above received the contingency plan? ☐ Yes ☒ No

9.3.F.(9, 10) g) If the contingency plan has been implemented, was a written report filed with the Commissioner and were the Commissioner and other required authorities properly notified before operations resumed? N/A ☐ Yes ☐ No

6.5.A. 18. Does the facility retain copies of all manifests, annual reports, and test results for at least three years? could not find test results of samples taken from the haz waste generated ☐ Yes ☒ No

6.5.B. 19. Has the facility submitted an annual report for the preceding calendar year? ☒ Yes ☐ No

20. Comments

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Inspector's Name:

*Renee C. Tyson*

Title:

*Chemist*

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection:

*6/25/86*

Inspector's Name:

Title:

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection:

CHECKLIST FOR RCRA INSPECTION OF TREATMENT,  
STORAGE & DISPOSAL (TSD) FACILITIES

Name of Facility: Rehrig International  
Address: 901 North Lombardy Street  
Richmond, Va. 23227  
EPA ID Number: VAD089028377  
Facility Inspection Representative: Paul Bouz  
Title: Plating Manager  
Telephone: (804) 355-7864

VA HWM Regs.  
Reference

1. The facility: treats, stores, disposes  
(Circle as appropriate)
- 9.1.C.1. 2. Does the facility receive hazardous waste from a foreign source? Yes No
- If yes, has the facility notified the Commissioner of the date of arrival? Yes No
- 9.1.D.(1, 2, 3) 3. Does the facility have a detailed chemical and physical analysis of a representative sample of the waste? Analysis seen at previous inspection were not available, had been misplaced. Needed to be updated. Yes No
- 9.1.D.5. 4. Does the facility have a waste analysis plan which specifies the following: Yes No
- a) the parameters for each hazardous waste; Yes No
- b) test methods for each parameter; Yes No
- c) the sampling method used to obtain a representative sample; Yes No
- d) frequency to review initial analysis. Yes No
- 9.1.D.6. 5. If the facility receives wastes generated off-site, does the plan specify procedures and sampling methods to ensure that the waste matches the identity of the waste designated on the accompanying manifest or shipping paper? N/A Yes No
- 9.1.E.1. 6. Will physical contact or disturbance of the waste injure unknowing persons or livestock? Yes No
- If yes, does the TSD facility have:

- 9.1.E.2.a. a) a 24-hour surveillance system which monitors and controls entry to the active portion of the facility? ☒ Yes ☐ No
- 9.1.E.2.a.(1) b) an artificial or natural boundary which surrounds active portions of the facility? and, ☒ Yes ☐ No
- 9.1.E.2.a.(2) c) a means to control entry at all times? (i.e., gates, attendants, locked entrances, etc.) ☒ Yes ☐ No
- 9.1.E.3. d) a restricted access sign posted at each entrance to the active portion of the facility? ☒ Yes ☐ No
- Is sign legible from a distance of 25 feet? ☒ Yes ☐ No
- Is sign in English and any other foreign language predominant to the geographical area? ☒ Yes ☐ No
- 9.1.F.2.a. 7. Does the TSD facility have a written schedule for inspecting all equipment necessary for prevention, detection or response to environmental or human health hazards? ☒ Yes ☐ No
- 9.1.F.2.c. a) Does the schedule identify the types of problems which are to be looked for during the inspection? Yes ☒ No
- 9.1.F.2.d. b) Does the schedule include frequency of these inspections? weekly ☒ Yes ☐ No
- 9.1.G.1. 8. Have the facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? ☒ Yes ☐ No
- 9.1.G.2. 9. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? This should be stated and followed, in your training outline. Yes ☐ No
- 9.1.G.3. 10. Do personnel participate in an annual review of their initial training? Yes ☒ No
- 9.1.G.4.a. 11. Does the facility maintain a record of (a) job titles for personnel that are involved with hazardous waste management and (b) the name of the employee filling each job? Still have not included all employees involved with hazardous waste mgmt. Yes ☒ No

- |                  |   |                                      |                                     |
|------------------|---|--------------------------------------|-------------------------------------|
| 9.1.G.4.b.       | 12. Does the facility have on record a written position description for each job title noted in Question #11? <i>See comment item #11</i>   | Yes                                  | <input checked="" type="radio"/> No |
| 9.1.G.4.c.       | 13. Does the facility maintain a written description of the type and amount of introductory and continuing training for those employees involved in hazardous waste management?   | Yes                                  | <input checked="" type="radio"/> No |
| 9.1.G.4.d.       | 14. Does the facility have records to document this training?   | Yes                                  | <input checked="" type="radio"/> No |
| 9.2.B.<br>9.2.D. | 15. At the facility, is the following equipment installed:  |                                      |                                     |
| 9.2.B.1.         | a) An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion?   | <input checked="" type="radio"/> Yes | No                                  |
| 9.2.B.2.         | b) A device at the scene of hazardous waste operations capable of summoning emergency assistance from Police, Fire departments, etc.?   | <input checked="" type="radio"/> Yes | No                                  |
| 9.2.B.(3, 4)     | c) Portable fire extinguishers, fire control, spill control, and decontamination equipment and water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system?   | <input checked="" type="radio"/> Yes | No                                  |
| 9.2.C.           | 16. Is a record of tests and inspections of required equipment (question 15) maintained at the facility?  | <input checked="" type="radio"/> Yes | No                                  |
| 9.2.E.           | 17. Does the facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies?   | <input checked="" type="radio"/> Yes | No                                  |
| 9.3.A.1.         | 18. Does the facility have an established contingency plan to deal with any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to the air, soil, groundwater or surface water that may impact hazardous waste currently in storage at the facility? <i>Plan does not address steps taken in case of spills.</i> | Yes                                  | <input checked="" type="radio"/> No |
| 9.3.             | 19. Does the contingency plan contain the following elements:   |                                      |                                     |



9.3.B.(1, 2)

- a) A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water? *Still have not addressed spill procedures.*

Yes

No ☒

9.3.B.3.

- b) A detailed description of arrangements formally agreed to by local police, fire departments, and state and local emergency teams to provide assistance during emergency situations?

Yes

No ☒

9.3.B.4.  
9.3.E.

- c) A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators?  
List primary coordinator.

Yes ☒

No

Name

Paul Bouz

Title

Planting Manager

Telephone

355-7864

9.3.B.5.

- d) A list of all required emergency equipment necessary to cope with emergencies at the generator facility?

Yes ☒

No

9.3.B.5.

- e) Does this list specify the location and of each item on the list, and a brief description of each item on the list, and a brief outline of its capabilities?

Yes

No ☒

9.3.C.

- f) Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? List:

Yes ☒

No

Richmond Police

"

Fire

9.3.B.

- Still have not address the hospital who would respond in case of emergency*  
1) Is there documentation to indicate the personnel listed above received the contingency plan?

Yes

No ☒

9.3.F.(9, 10)

g) If the contingency plan has been implemented, was a written report filed with the Commissioner and were the Commissioner and other required authorities properly notified before operations resumed? *N/A*

Yes No

9.3.D.

20. Have any amendments of the contingency plan been necessary? If yes, explain in comment section.

Yes ☒ No

9.4.B.2.e.  
5.4.E.1.

21. Does the facility retain copies of all manifests, and inspection results for at least three years?

Yes ☒ No

22. Does the TSD facility receive hazardous waste from off-site generators?

Yes ☒ No

9.4.A.

If yes, has the TSD determined: *N/A*

5.5.C.2.a.

a) That manifests are completed, signed, and dated by the generator and each transporter for all shipments received

Yes No

5.5.C.2.b.

b) That the manifest copies are signed and dated

Yes No

5.5.C.2.d.

c) A copy has been given to the transporter

Yes No

5.5.C.2.e.

d) A copy has been sent to the generator

Yes No

5.5.C.2.f.

e) A copy has been retained and filed at the TSD facility.

Yes No

9.4.B.

23. Does the TSD facility have a written operating record which contains the following information:

For facility receiving off-site hazardous waste: *N/A*

9.4.B.2.a.

a) A description of and the quantity of each hazardous waste received, and the method and date of treatment, storage or disposal? (Use Appendix 9.1)

Yes No

Storage \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_

Treatment \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_

Disposal \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_

9.4.B.2.b.

b) The location of each hazardous waste within the facility and the quantity at each location recorded on a map or diagram of each cell or disposal area?

Yes      No

9.4.B.2.c.

c) Detailed records and results of waste analyses and incineration trial tests performed on wastes coming into the facility? *N/A*

Yes      No

9.4.B.2.d.

d) Detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan? *N/A*

**Yes      No**

9.4.B.2.e.  
9.1.F.4.

e) Detailed records and results of inspections performed on facility emergency equipment, TSD systems, and hazardous waste areas?

**Yes**

No

9.4.B.2.f.

f) Detailed monitoring, testing, and analytical data where required? *N/A*

**Yes**

No

9.4.B.2.g.

g) All closure cost estimates, and for disposal facilities all post-closure cost estimates? *Closure cost estimate not adequate, according to information in closure plan and Part A.*  
Closure Cost Estimate \$ 9,595.00

Yes

NO

9.6.

24. Does the facility have a written closure plan which includes:

9.6.C.1.b.

a) An estimate of the maximum waste inventory in storage or treatment at any time during life of facility?

**Yes**

No

9.6.C.1.c.

b) A description of steps that will be used to decontaminate facility equipment?

**Yes**

No

9.6.C.1.d.

c) An estimate of the expected year for closure?

Yes

**No**

9.6.C.1.d.

d) A schedule for final closure?

**Yes**

NO

e) A copy of the closure plan given to the inspector?

Yes

No

9.7.C.

25. For all TSD facilities, has financial assurance for closure for this facility been established?

**Yes**

No

Instrument(s) used:

- ☐ Trust Fund
- ☐ Letter of Credit
- ☐ Performance Bond
- ☐ Financial Test
- ☒ Financial Guarantee Bond
- ☐ Certificate of Insurance
- ☐ Corporate Guarantee

26. *Facility has a surety bond for \$10,000.*  
Has a copy of all related documents been forwarded to the Virginia State Department of Health?

☒ Yes ☐ No

\* Submittal Date \_\_\_\_\_

If no, was a copy of these documents provided to the inspector?

Yes ☐ No ☐

If no, will a copy of these documents be mailed to the Virginia State Department of Health?

Yes ☐ No ☐

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.7.G.

27. Has liability coverage for sudden accidental occurrences\*\* been established for this facility?

☒ Yes ☐ No

Instrument(s) used:

- ☒ Certificate of Insurance
- ☐ Financial Test
- ☐ Liability Endorsement

28. Has a copy of all related documents been forwarded to the Virginia State Department of Health?

Yes ☐ No ☐

\* Submittal Date \_\_\_\_\_

\* If the financial test was used, all three (3) initially submitted items specified in § 9.7.C.5. must be updated within 90 days after the close of each succeeding fiscal year.

\*\* Sudden accidental occurrences: at least \$1 million per occurrence and \$2 million annual aggregate.

Non-sudden accidental occurrences: at least \$3 million per occurrence and \$6 million annual aggregate.

If no, was a copy of these documents provided to the inspector?

Yes No

If no, will a copy of these documents be mailed to the Virginia State Department of Health?

Yes No

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.6.H. 29. For landfills, surface impoundments, waste piles and land treatment facilities, does the facilities have a written post-closure plan that includes: N/A

9.6.H.1.a. a) Groundwater monitoring activities?

Yes No

9.6.H.1.b. b) Maintenance activities to ensure containment?

Yes No

9.6.H.1.c. c) Name, address, and phone number of contact during post-closure period?

Yes No

d) Post-closure cost estimate?

Yes No

Amount \$ \_\_\_\_\_

9.7.E. 30. For landfills, surface impoundments, waste piles and land treatment facilities, has financial assurance for post-closure care has been estimated? N/A

Yes No

Instrument(s) used:

- ☐ Trust Fund
- ☐ Letter of Credit
- ☐ Performance Bond
- ☐ Financial Test
- ☐ Financial Guarantee Bond
- ☐ Certificate of Insurance
- ☐ Corporate Guarantee

31. Has a copy of all related documents been forwarded to the Virginia State Department of Health? N/A

Yes No

\* Submittal Date \_\_\_\_\_

\* If the financial test was used, all three (3) initially submitted items specified in § 9.7.C.5. must be updated within 90 days after the close of each succeeding fiscal year.

Form "B"

If no, was a copy of these documents provided to the inspector?

Yes No

If no, will a copy of these documents be mailed to the Virginia State Department of Health?

Yes No

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.7.G.2.

32. For landfills, surface impoundments and land treatment facilities has liability coverage\*\* for nonsudden accidental occurrences been established? N/A

Yes No

Instrument(s) used:

- ☐ Certificate of Insurance  
☐ Financial Test  
☐ Liability Endorsement

33. Has a copy of all related documents been forwarded to the Virginia State Department of Health? N/A

Yes No

\* Submittal Date \_\_\_\_\_

If no, was a copy of these documents provided to the inspector?

Yes No

If no, will a copy of these documents be mailed to the Virginia State Department of Health?

Yes No

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.5.

34. For landfills, surface impoundments, wastepiles (if closed as landfills) and land treatment facilities, has a groundwater monitoring program been implemented? N/A

Yes No

9.4.D.

35. Has an annual report been filed?

Yes No

\* If the financial test was used, all three (3) initially submitted items specified in § 9.7.C.5. must be updated within 90 days after the close of each succeeding fiscal year.

\*\* Sudden accidental occurrences: at least \$1 million per occurrence and \$2 million annual aggregate.

Non-sudden accidental occurrences: at least \$3 million per occurrence and \$6 million annual aggregate.

36. Comments:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inspector's Name:

BENEÉ C. Tyson

Title:

Chemist

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection:

6/25/85

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

CHECKLIST FOR RCRA INSPECTION OF USE  
AND MANAGEMENT OF CONTAINERS

Name of Facility: Bahrig International  
Address: 901 North Lombardy Street  
Richmond, Va. 23227  
EPA Generator ID Number: VAD089028 377  
Facility Inspection Representative: Paul Bauz  
Title: Planting Manager  
Telephone Number: (804) 355-7864

The questions contained in this checklist apply to owners and operators of all hazardous waste facilities and generators accumulating less than 90 days (see § 6.4.E.1.a. that store containers of hazardous waste, except as § 9. provides otherwise.

VA HWM Regs.  
Reference

- |                        |   |                                      |    |
|------------------------|---|--------------------------------------|----|
| 9.8.B.                 | 1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?  | <input checked="" type="radio"/> Yes | No |
| 9.8.C.                 | 2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes? | <input checked="" type="radio"/> Yes | No |
| 9.8.D.1.               | 3. Are all containers holding hazardous waste kept closed during storage?   | <input checked="" type="radio"/> Yes | No |
| 9.8.E.                 | 4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week?  | <input checked="" type="radio"/> Yes | No |
| 9.1.F.2.a.<br>9.1.F.4. | 5. Is an inspection log maintained? (See question #7 of TSD checklist.)   | <input checked="" type="radio"/> Yes | No |
| 9.8.F.                 | 6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?  | <input checked="" type="radio"/> Yes | No |
| 9.8.G.1.               | 7. Are incompatible wastes placed in separate containers? (See APPENDIX 9.4 for examples of incompatible waste). <u>N/A</u>   | Yes                                  | No |



9.8.G.3.

8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? *N/A*

Yes No

9. Comments:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inspector's Name: \_\_\_\_\_

*RENEE' C. Tyson*

Title: \_\_\_\_\_

*Chemist*

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

*6/25/86*

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

# REHRIG INTERNATIONAL

*M. Beck*  
**RICHMOND PLANT**

901 North Lombardy Street  
Richmond, Virginia 23220

(804) 355-7864

~~Certified Mail - Return Receipt Requested~~ *NO.*

July 9, 1986

Environmental Protection Agency  
Region III  
841 Chestnut Building  
Philadelphia, PA 19107

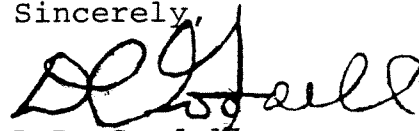
ATTN: Ms. Mary Beck

Re: Topographic Map, our letter dated May 20, 1986.

Dear Ms. Beck:

Attached is the 7½ minute quad sheet which we received today.

Sincerely,



D.P. Goodell  
Vice President  
General Manager

Enclosures:

cc: Paul Bauz  
Plating Manager

LEL/vc



THE LEADER IN CONTAINERS SINCE 1913

6/20/86

CHECKLIST FOR SWMU RESPONSES

NAME OF FACILITY Rehrig International  
EPA ID No. VA2 08 902 8377

DID THE FACILITY SUBMIT THE FOLLOWING DATA:

The location of all existing and former solid waste management units (SWMUs) on the facility property (maps 1" = 200') YES \_\_\_\_\_ NO \_\_\_\_\_  
*Map rec'd 7/11 but not the correct type*

Construction design information of each SWMU YES ☒ NO \_\_\_\_\_

Information of the waste handled at each SWMU YES ☒ NO \_\_\_\_\_

Data and descriptions of potential or prior releases from each SWMU YES ☒ NO \_\_\_\_\_

Certification YES \_\_\_\_\_ NO ☒

Description/Number of SWMUs (non RCRA regulated)

Land Disposal \_\_\_\_\_  
Land Treatment \_\_\_\_\_  
Surface Imp. \_\_\_\_\_  
Other \_\_\_\_\_

Incinerators \_\_\_\_\_  
Tanks 1 pit & tanks for pretreatment of nickel  
Drums chrome plating operations  
270.11(d)  
pretreatment of nickel chrome plating operations

Is there evidence of contamination  
Groundwater YES \_\_\_\_\_ NO ☒  
Surface water YES \_\_\_\_\_ NO ☒  
Air YES \_\_\_\_\_ NO ☒

PRIORITY

HIGH \_\_\_\_\_ Reported evidence of release to air, ground or surface water  
MEDIUM \_\_\_\_\_ No releases reported; but land based SWMUs reported  
LOW ☒ Everything else

COMMENTS:

REHRIG INTERNATIONAL  
VAD 08 902 8377

SWMU RESPONSE

# REHRIG INTERNATIONAL

## RICHMOND PLANT

901 North Lombardy Street  
Richmond, Virginia 23220

(804) 355-7864

Certified Mail - Return Receipt Requested

May 20, 1986

Environmental Protection Agency  
Region III  
841 Chestnut Building  
Philadelphia, PA 19107

ATTN: Ms. Mary Beck

Re: S.W.M.U. Disclosure (2 copies enclosed)  
Rehrig International, Inc.  
VAD 08-902-8377

Dear Ms. Beck:

The following is in response to your letter dated  
February 24, 1986:

(1). TOPOGRAPHIC MAP

As of this date we have not received the 7½ minute quad sheet from the Dept. of Interior. Attached are copies of our application. We will expedite the map to you immediately upon our receipt of it.

HISTORY OF BUILDING

The building was originally built in 1904 by Export Leaf Tobacco Company and was used as a tobacco leaf storage facility until 1977. Building was purchased in 1977 by Bowe Street Associates, 1506 Bloomfield Road, Richmond, VA 23225. The building remained vacant from 1977 until 1979 when Rehrig International leased a portion of the building. Prior to the installation of Rehrig International's chrome plating line in 1980, there were no former solid waste units located in this building. The following is a history of Rehrig International's occupation of the building (please refer to attached plant layout):

- |    |                   |   |   |
|----|-------------------|---|---|
| A. | 7-1-79 to 2-1-80  | = | Bays A1, B1, B2, & B3.                      |
| B. | 2-1-80 to 5-1-82  | = | Add Bay A2.                                 |
| C. | 5-1-82 to 7-1-83  | = | Add Bay A3.                                 |
| D. | 7-1-83 to PRESENT | = | Add Bay's A4, A5, A6, B4, B5, B6, B7, & B8. |

Rehrig International presently leases the entire building.



THE LEADER IN CONTAINERS SINCE 1913

May 20, 1986

- (2). UNIT'S FUNCTION: To receive waste water from the chrome plating operation and to pretreat for removal of metals from the nickel chrome plating operation.

MATERIAL OF CONSTRUCTION: Specially lined pit 10 ft. x 10 ft. x 10 ft. From this pit the water is pumped through a series of lined tanks, the last tank having a baffle for collecting sludge. Then the water is pumped through a filter press.

DIMENSION, CAPACITY & ANCILLARY PIPING:

All piping is CPVC, schedule 80.  
Capacity is 30 gallons per minute.

ENGINEERING DRAWINGS: None Available.

- (3). DESCRIPTION OF SOLID WASTE: Waste water from nickel chrome plating operation.

QUANTITIES: Annual quantity of waste water passing through system is approximately 6500 ccf.

DATES OF OPERATION: Continually with the plating operation.

RELEASES: No releases of hazardous waste have ever been originated from this unit.

Yours

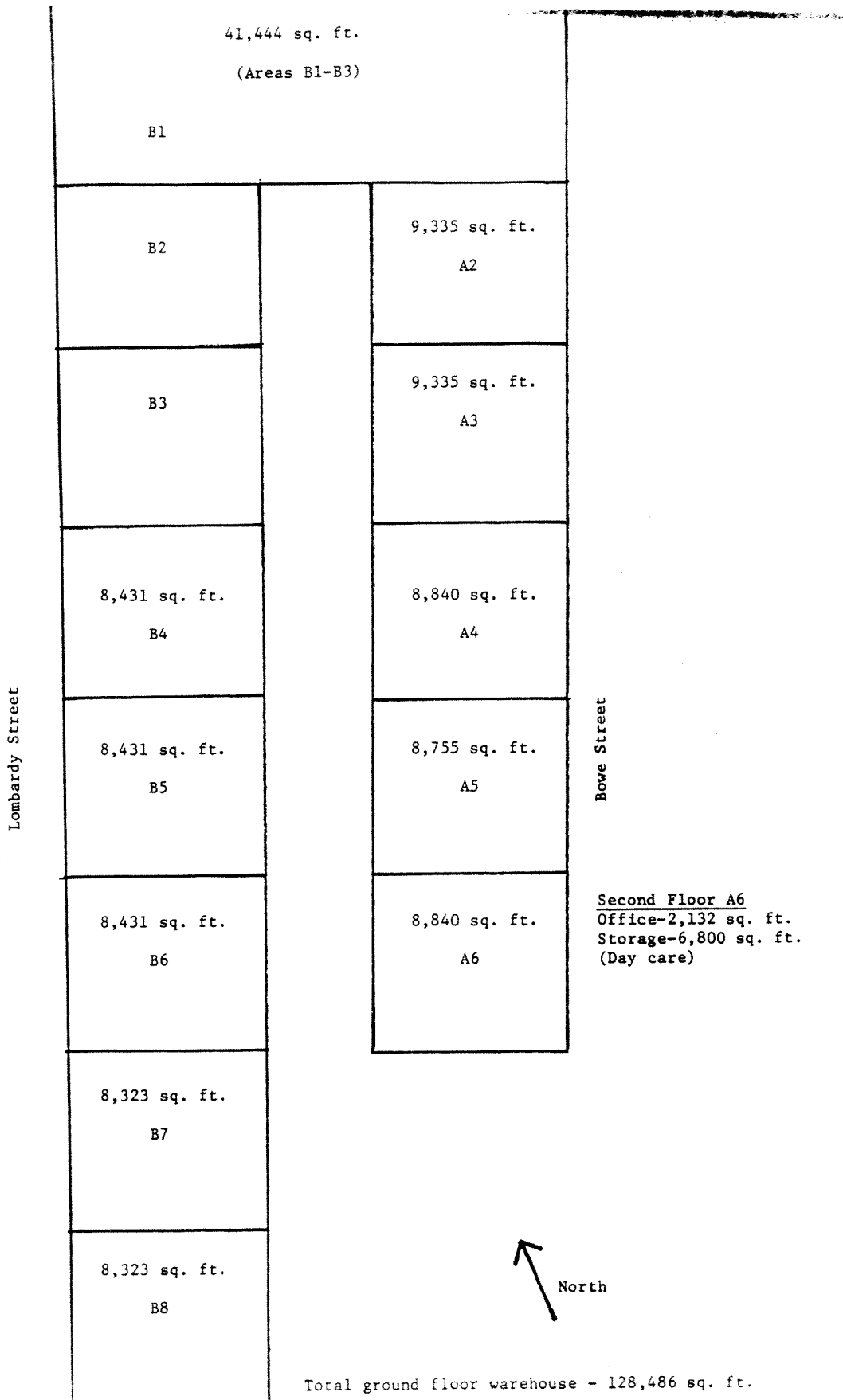


D.P. Goodell  
Vice President,  
General Manager

Enclosures

cc: Paul Bauz  
Plating Manager

LEL/vc



UNITED STATES DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY

MAP ORDER BLANK

TO: U.S. GEOLOGICAL SURVEY  
1200 SOUTH EADS STREET  
ARLINGTON, VIRGINIA 22202

DATE: 4-29-86

FROM: Name BEHRIG INTERNATIONAL, INC.  
Street Address 901 N. LOMBARDY ST  
City RICHMOND State VA Zip Code 23220

ALPHABETIZE map names in state groups. List THEMATIC maps by Alpha-Numeric number.

Quantity	Map Name	State	Scale	Unit Price	Total Price
1	2 STANDARD TOPOGRAPHIC			\$	\$
2	QUADRANGLE MAP	VA-	1:24,000'	2.50	5.00
3		RICHMOND			
4					
5	(Per area highlighted on attached)				
6					
7					
8					
9	- PLEASE RUSH -				
10					
11					
12					
13					
14					
15					
16					

Remittance payable to Dept. of the Interior-USGS

Total 5.00

FOR PROMPT, ACCURATE SHIPMENT PLEASE FILL IN THE FOLLOWING LABEL  
Please PRINT or TYPEWRITE

U.S. GEOLOGICAL SURVEY  
1200 South Eads Street  
Arlington, Virginia 22202

Name BEHRIG INTERNATIONAL, INC.  
Street Address 901 N. LOMBARDY ST  
City RICHMOND State VA





77°  
39°

INTERNATIONAL  
N. LOMBARDY STREET  
RICHMOND, VIRGINIA 23220

PAY  
TO THE  
ORDER OF

*Dept. of Interior -4565*

15098

*4-29* 19*86*

FEB 11 1986

SOVRAN BANK  
Sovran Bank, N.A. Richmond, Virginia 23261

**EXACTLY \$5 AND 00 CTS**

\$ *5.00*

DOLLARS

OR *Attache*

*Larry Lewis*

⑈00015098⑈ ⑆051000017⑆ 0200 9106⑈

# REHRIG INTERNATIONAL

## RICHMOND PLANT

901 North Lombardy Street  
Richmond, Virginia 23220

(804) 355-7864

Certified Mail - Return Receipt Requested

May 20, 1986

Environmental Protection Agency  
Region III  
841 Chestnut Building  
Philadelphia, PA 19107

ATTN: Ms. Mary Beck

Re: S.W.M.U. Disclosure (2 copies enclosed)  
Rehrig International, Inc.  
VAD 08-902-8377

Dear Ms. Beck:

The following is in response to your letter dated  
February 24, 1986:

(1). TOPOGRAPHIC MAP

As of this date we have not received the 7½ minute quad sheet from the Dept. of Interior. Attached are copies of our application. We will expedite the map to you immediately upon our receipt of it.

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- |    |                   |   |   |
|----|-------------------|---|---|
| A. | 7-1-79 to 2-1-80  | = | Bays A1, B1, B2, & B3.                      |
| B. | 2-1-80 to 5-1-82  | = | Add Bay A2.                                 |
| C. | 5-1-82 to 7-1-83  | = | Add Bay A3.                                 |
| D. | 7-1-83 to PRESENT | = | Add Bay's A4, A5, A6, B4, B5, B6, B7, & B8. |

Rehrig International presently leases the entire building.



THE LEADER IN CONTAINERS SINCE 1913

May 20, 1986

- (2). UNIT'S FUNCTION: To receive waste water from the chrome plating operation and to pretreat for removal of metals from the nickel chrome plating operation.

MATERIAL OF CONSTRUCTION: Specially lined pit 10 ft. x 10 ft. x 10 ft. From this pit the water is pumped through a series of lined tanks, the last tank having a baffle for collecting sludge. Then the water is pumped through a filter press.

DIMENSION, CAPACITY & ANCILLARY PIPING:

All piping is CPVC, schedule 80.  
Capacity is 30 gallons per minute.

ENGINEERING DRAWINGS: None Available.

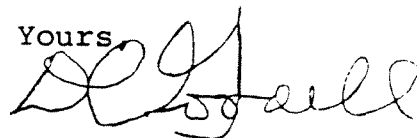
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QUANTITIES: Annual quantity of waste water passing through system is approximately 6500 ccf.

DATES OF OPERATION: Continually with the plating operation.

RELEASES: No releases of hazardous waste have ever been originated from this unit.

Yours



D.P. Goodell  
Vice President,  
General Manager

Enclosures

cc: Paul Bauz  
Plating Manager

LEL/vc

Lombardy Street

41,444 sq. ft. (Areas B1-B3)		
B1		
B2		9,335 sq. ft. A2
B3		9,335 sq. ft. A3
8,431 sq. ft. B4		8,840 sq. ft. A4
8,431 sq. ft. B5		8,755 sq. ft. A5
8,431 sq. ft. B6		8,840 sq. ft. A6
8,323 sq. ft. B7		
8,323 sq. ft. B8		

Bowe Street

Second Floor A6  
Office-2,132 sq. ft.  
Storage-6,800 sq. ft.  
(Day care)



Total ground floor warehouse - 128,486 sq. ft.

UNITED STATES DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY

MAP ORDER BLANK

TO: U.S. GEOLOGICAL SURVEY  
1200 SOUTH EADS STREET  
ARLINGTON, VIRGINIA 22202

DATE: 4-29-86

FROM: Name BEHRIG INTERNATIONAL, INC.  
Street Address 901 N. LOMBARDY ST  
City RICHMOND State VA Zip Code 23220

ALPHABETIZE map names in state groups. List THEMATIC maps by Alpha-Numeric number.

Quantity	Map Name	State	Scale	Unit Price	Total Price
1	2	STANDARD TOPOGRAPHIC		\$	\$
2	QUADRANGLE MAP	VA-	1:24,000'	2.50	5.00
3		RICHMOND			
4					
5	(Per area highlighted in attached)				
6					
7					
8					
9	- PLEASE RUSH -				
10					
11					
12					
13					
14					
15					
16					
Remittance (payable to Dept. of the Interior-USGS)					Total 5.00

for PROMPT, ACCURATE SHIPMENT PLEASE FILL IN THE FOLLOWING LABEL  
Please PRINT or TYPEWRITE

U.S. GEOLOGICAL SURVEY  
1200 South Eads Street  
Arlington, Virginia 22202

Name BEHRIG INTERNATIONAL, INC.  
Street Address 901 N. LOMBARDY ST  
City RICHMOND State VA Zip Code 23220



INTERNATIONAL  
N. LOMBARDY STREET  
RICHMOND, VIRGINIA 23220

PAY  
TO THE  
ORDER OF

*Dept. of Interior -4565*

15098

*4-29* 19*86*

FEB 1 1986

SOVRAN BANK  
Sovran Bank, N.A. Richmond, Virginia 23261

**EXACTLY \$5 AND 00 CTS**

\$ *5.00*

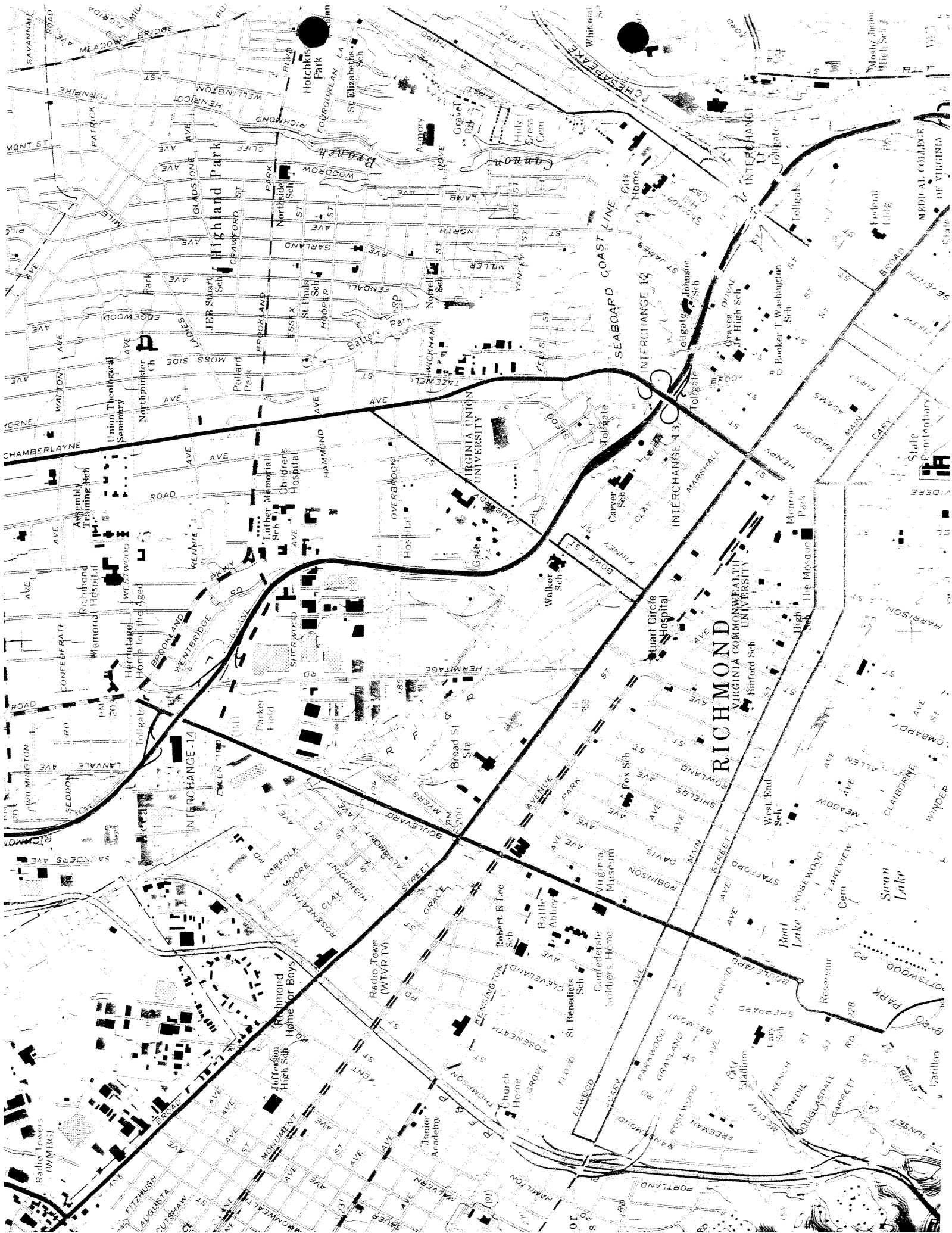
DOLLARS

OR *Attaches*

*Larry Lewis*

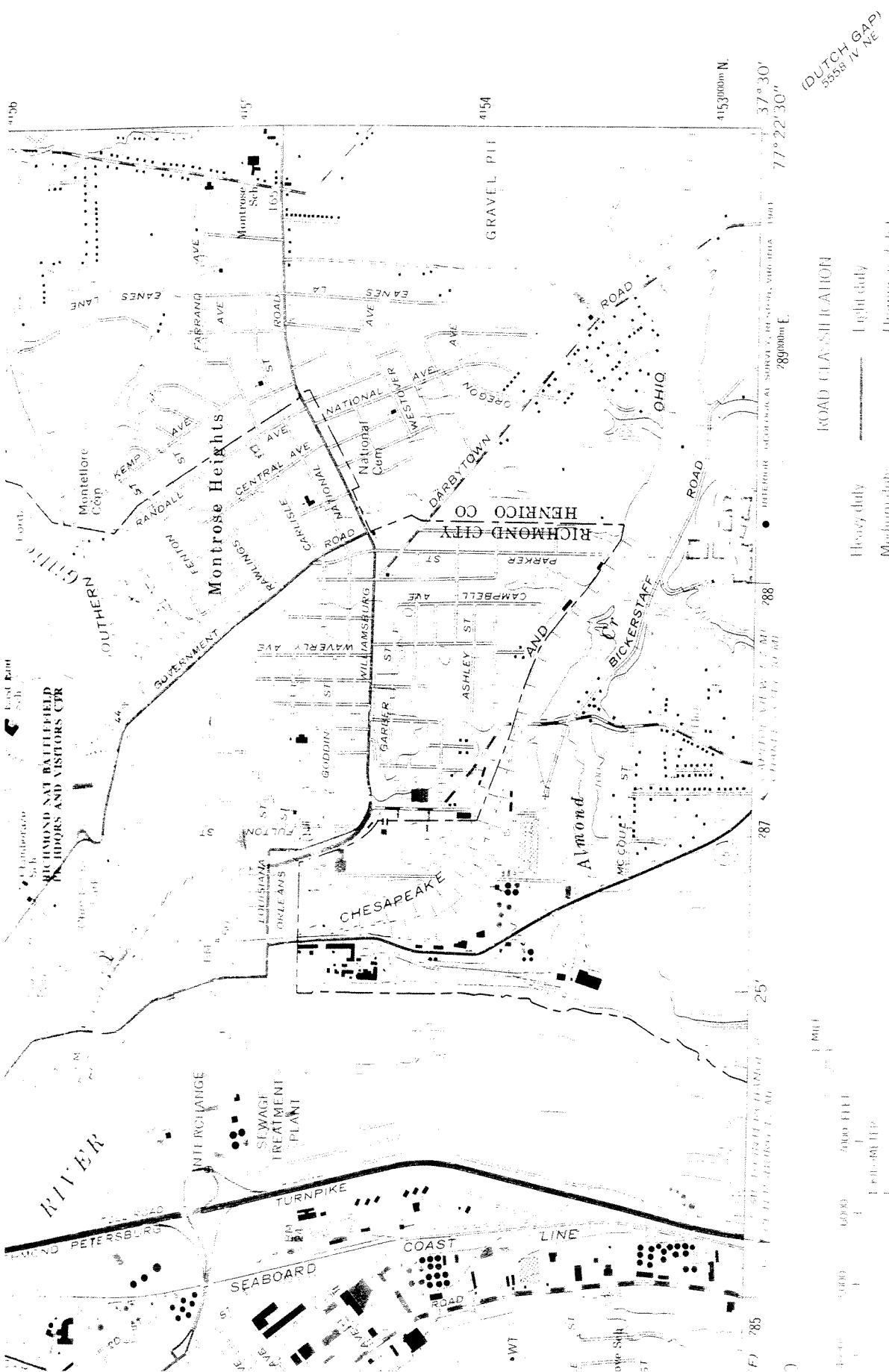
⑈00015098⑈ ⑈051000017⑈ 0200 9106⑈





**RICHMOND**

VIRGINIA COMMONWEALTH UNIVERSITY



10 FEET  
 DATUM OF 1929  
 MEAN LOW WATER  
 DATUMS IS VARIABLE  
 IF LINE OF MEAN HIGH WATER  
 XIMATELY 3.2 FEET

AP ACCURACY STANDARDS  
 RESTON, VIRGINIA 22092  
 CHARLOTTESVILLE, VIRGINIA 22903  
 SYMBOLS IS AVAILABLE ON REQUEST

ROAD CLASSIFICATION  
 Heavy duty ——— Light duty ———  
 Medium duty - - - - - Unimproved dirt  
 Inter State Route U.S. Route State Route

(DUTCH GAP)  
 5558 IV NE

RICHMOND, VA.  
 N3730—W7722.5/7.5  
 1964

DMA 5559 III SW—SERIES V834







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

FEB 24 1986

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Philip Goodell  
Vice President  
Rehrig International Inc.  
901 N. Lombardy Street  
Richmond, Virginia 23220

Re: Rehrig International Inc.  
VAD 08 902 8377

Dear Mr. Goodell:

Sections 3004(u) and 3008(h) of the Hazardous and Solid Waste Amendments of 1984 (RCRA Reauthorization) give EPA the authority to require corrective action for all releases of hazardous wastes or constituents from any solid waste management unit ("SWMU") as defined on the enclosed sheet. This requirement applies to operating units, inactive units, as well as those that are closing or have been closed in the past.

EPA and the State must first determine the location of all SWMUs at your facility. Next, we must determine whether or not any "releases" (see definitions) originated at these units. In order to enable us to make these determinations, you must provide the following information:

- (1) A topographic map showing the facility and a distance of 1,000 feet around it, at a scale of one-inch equal to not more than 200 feet. In addition to showing the location of the hazardous waste management facilities for which you are seeking a permit, it must locate all existing and former SWMU's at your facility.
- (2) For each SWMU, provide a description of the unit's functions, material of construction, dimensions, capacity, ancillary systems (piping), etc. If available, provide engineering drawings of the units and their foundations. For closed facilities, also provide a copy of the closure plans, a description of how closure was performed and any relevant post-closure information you have available.
- (3) For each SWMU, provide a description of all solid wastes including hazardous wastes and hazardous waste constituents received by the units. Also, provide information on quantities of hazardous wastes and hazardous waste constituents received by each SWMU and the dates during which these units operated.

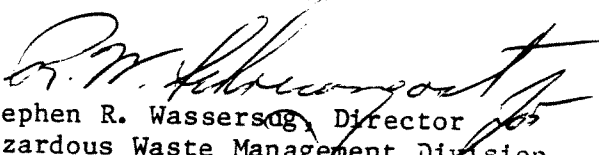
- (4) For each SWMU, describe any releases (or possible releases) originating at the unit. This should include information on the date of release, type of solid waste, hazardous waste or hazardous waste constituents released, quantity released, nature of the release, extent of migration, and cause of release, for example, an overflow, broken pipe, tank leak, etc. Also, provide any available data which would quantify the nature and extent of environmental contamination including the results of soil, surface water and/or ground-water sampling and analysis efforts. Likewise, any monitoring information that indicates releases are not present should also be submitted.

If some or all the above requested information has been previously submitted to this office, please reference this information in your reply.

We request under Section 3007 of the Act, 42 U.S.C. §6927, that you submit two copies of the above listed information within forty-five (45) days of your receipt of this letter to both EPA and the Virginia Bureau of Solid and Hazardous Waste Management.

All information you submit should be certified as required by regulation 40 C.F.R. 270.11(d). Should you have any questions concerning this letter, please contact Ms. Mary Beck, P.E., at (215) 597-7239.

Sincerely,

  
Stephen R. Wassersog, Director  
Hazardous Waste Management Division

Enclosure

cc: Mr. Wladimir Gulevich, Ph.D., P.E.  
Virginia Department of Health  
Bureau of Hazardous Waste Management

Mr. Paul Bauz  
Plating Manager  
Rehrig International, Inc.

## Definitions

Release - ...any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injection, escaping, leaching, dumping or disposing into the environment.

### Solid Waste Management Unit --

...any landfill, surface impoundment, waste pile, land treatment unit, incinerator, tank (including storage, treatment, and accumulation tanks), container storage units, injection wells, wastewater treatment units, elementary neutralization units, transfer station, and recycling units and any other solid waste management unit that received solid waste including hazardous waste or hazardous waste constituents at any time.



JAN 2 1965

COPIES RETURN  
RECEIPT REQUESTED

Larry E. Lewis, Controller  
Kuhlig International, Inc.  
904 North Lombardy Street  
Richmond, Virginia 23220

Dear Mr. Lewis:

Enclosed is a copy of the compliance order signed by you at a meeting in our office on December 19, 1964. The Commissioner of Health, Dr. H. H. Bailey, has signed the order and its terms must be carried out as directed.

If you have questions, please contact Arthur L. Stone of my staff at (804) 522-2447.

Sincerely,

WILLIAM F. BRYAN, P.E., Director  
Bureau of Health and Environment  
State Department

WFB:bry

Enclosure

cc:



**AUGUST 19, 1986**

**INTERNAL MEMO – USEPA REGION III**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

↓  
SUBJECT: RCRA Inspection - ~~Philadelphia International~~  
VAD089028377

DATE: 8/19/86

FROM: Traci I. Self, Environmental Engineer *TIS*  
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

TO: FILE

THRU: John A. Armstead, Chief  
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS  
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE  
VIOLATIONS.

**OCTOBER 8, 1986**

**RCRA INSPECTION**



# COMMONWEALTH of VIRGINIA

DEPARTMENT OF WASTE MANAGEMENT  
11th Floor, Monroe Building  
101 N. 14th Street  
Richmond, Va. 23219

Larry E. Lewis  
Rehrig International  
901 North Lombardy Street  
Richmond, VA 23220

OCT 08 1986

CERTIFIED-RETURN  
RECEIPT REQUESTED

Dear Mr. Lewis:

On September 24, 1986 your facility was reinspected in accordance with the Virginia Hazardous Waste Management Regulations (VHWMR). During this visit it was noted that the facility had made significant improvements in complying with hazardous waste requirements; however, there are still a few areas that are not in total compliance with the Regulations. These deficiencies are indicated on the enclosed checklists.

Please take the appropriate corrective action for bringing your facility in total compliance with the regulations by November 10, 1986.

Thank you for your cooperation during this visit. If you have any questions regarding this matter please call me at (804) 225-2667.

Sincerely,

A handwritten signature in cursive script that reads "Renee C. Tyson".

Renee C. Tyson, Chemist  
Bureau of Hazardous Waste Management

Enclosure

SURVEY SHEET

7/1/86

Name of Facility: Rahrig International

Address: 901 North Lombardy Street

Richmond, Virginia 23220

EPA Generator ID Number: VAD089028377

Facility Inspection Representative: Poul Bouz

Title: Plating Manager

Telephone Number: (804) 355-78104

1. What is business activity of firm? (i.e., furniture mfg., metal plating, recycling, etc.) manufacture shopping carts

2. Give brief description of waste stream(s) and code designation(s). Foot  
Nickel-chrome plating sludge.

3. List the amounts of hazardous waste generated, recycled and accumulated.

- a. Characteristic - Ignitable (D001)  
Corrosive (D002)  
Reactive (D003)  
EP Toxic (D004-  
D017)

- b. Listed (F, K, or U list) *Foot*

- c. Listed (P)

- d. Waste from spills of P and U list

[illegible]

4. Based on the above information, the company is classified as:

- a. Small quantity generator exempt from regulations. (Form C)
- b. Recycler not exempt from regulations. (Form A)

c. Generator. (Form A)

5. If facility treats, stores or disposes on-site complete Form B (unless exempt under § 9.).

6. Complete the appropriate checklists.

Container (Form I)

Surface Impoundment (Form K)

Landfill (Form N)

Tank (Form J)

Incineration & Thermal

Treatment (Form O & P)

Physical, Chemical & Biological

Treatment (Form Q)

7. Comments:

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

9/24/86

Survey

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

CHECKLIST FOR RCRA INSPECTION OF GENERATORS

Name of Facility: Rehrig International  
Address: 901 North Lombardy Street  
Richmond, Virginia 23220  
EPA Generator ID Number: VAD089028377  
Facility Inspection Representative: Bul Bauz  
Title: Planting Manager  
Telephone Number: (804) 355-7864

VA HWM Regs.  
Reference:

- 6.3
1. Is a manifest system currently used by the generator so that off-site shipment of hazardous wastes can be tracked? ☒ Yes ☐ No
  2. Is the following included on the generators manifest?
    - 5.3.B.1. a) The generator's name, address, telephone number and EPA ID number. ☒ Yes ☐ No
    - 5.3.B.2. b) A unique five digit number assigned to this manifest by the generator. ☒ Yes ☐ No
    - 5.3.B.3. c) Total number of pages used to complete the manifest. ☒ Yes ☐ No
    - 5.3.B.4. d) The company name and EPA identification of each transporter. ☒ Yes ☐ No
    - 5.3.B.5. e) The company name, site address and the EPA ID number of the facility designated to receive the waste listed on the manifest. ☒ Yes ☐ No
    - 5.3.B.6. f) The U.S. DOT description of each waste to include its proper shipping name, hazard class, and ID number (UN/NA), as identified in the Virginia Regulations Governing the Transportation of Hazardous Materials. ☒ Yes ☐ No



- 5.3.B.7. g) The units of weight or volume and the type and number of containers loaded in the transport vehicle included on the manifest form? ☒ Yes No
- 5.3.B.8. h) In case of international shipment, the point of departure (city & state) for those shipments destined for treatment, storage, and disposal outside the jurisdiction of the United States. ☒ Yes No
- 5.3.C. i) The following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature.
- "I hereby declare that the content of this consignment are fully and accurately described above by proper shipping name and are classified packed, marked, and labeled, and condition for transport by [mode of transportation] according to applicable international and national governmental regulations."
- 6.5.C.2. 3. Have manifest been received from TSD for waste shipped over 45 days ago. ☒ Yes No
- if not,
- has the generator filed an exception report? ☒ Yes No
- 5.5.A.7. 4. Did the generator determine that the transporter has a Virginia transporter permit? ☒ Yes No
- 6.4.E.1. 5. Is hazardous waste being accumulated on-site by the generator for less than 90 days? If yes, *N/A (Interim status for storage in containers)* Yes No
- 6.4.E.1.a. a) Is the waste placed in either containers or tanks? (If yes, fill out appropriate checklist. If no, TSD permit is required.) ☒ Yes No
- 6.4.E.1.b. b) Is the date accumulation of waste began clearly and visibly marked on each container and, does it indicate accumulation for less than 90 days? *N/A* Yes No

- 6.4.E.1.c. c) During accumulation, are the storage containers and/or tank clearly labeled with the words Hazardous Waste? *N/A* Yes No
- 9.1.G.1. 6. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? ☒ Yes No
- 9.1.G.2. 7. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? *This should be documented in your training outline* ☒ Yes No
- 9.1.G.3. 8. Do personnel participate in an annual review of their initial training? ☒ Yes No
- 9.1.G.4.a. 9. Does the facility maintain a record of:
- (a) job titles for personnel that are involved with hazardous waste management; and *Plant Manager not included* Yes ☒ No ✓
- (b) the name of the employee filling each job? *Plant Manager not included* Yes ☒ No ✓
- 9.1.G.4.b. 10. Does the facility have on record a written position description for each job title noted in Question #9? *Plant Manager not included* Yes ☒ No ✓
- 9.1.G.4.c. 11. Does the facility maintain a written description of the type and amount of introductory and continuing training for those employees involved in hazardous waste management? *Plant Manager not included* Yes ☒ No ✓
- 9.1.G.4.d. 12. Does the facility have records to document this training? *Please develop a training outline, no records for plant manager* Yes ☒ No ✓
- 9.2.B. 9.2.D. 13. At the facility, is the following equipment installed:
- 9.2.B.1. a) An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? ☒ Yes No

- 9.2.B.2.                    b) A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.?      ☒ Yes      No
- 9.2.B.(3, 4)                c) Portable fire extinguishers, fire control, spill control, and decontamination equipment and water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system?      ☒ Yes      No
- 9.2.C.                    14. Is a record of tests and inspections of required equipment (question 11) maintained at the facility?      ☒ Yes      No
- 9.2.F.                    15. Does the facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies?      ☒ Yes      No
- 9.3.A.1.  
6.4.E.1.d.                16. Does the facility have an established contingency plan to deal with any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to the air, soil, groundwater or surface water?      ☒ Yes      No
- 9.3.                    17. Does the contingency plan contain the following elements:
- 9.3.B.(1, 2)                a) A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water?      ☒ Yes      No
- 9.3.B.4.                    b) A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators?      ☒ Yes      No  
List primary coordinator.

Name Paul Braz

Title Plant Manager

Telephone 355-7864

- 9.3.B.5. c) A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? ☒ Yes ☐ No
- 9.3.B.5. d) Does this list specify the location and physical description of each item on the list and a brief description of each item on the list, and a brief outline of its capabilities. Yes ☒ No ☐
- 9.3.B.6. e) An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? ☒ Yes ☐ No
- 9.3.C. f) Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? List: ☒ Yes ☐ No  
Richmond Fire Dept  
\_\_\_\_\_  
\_\_\_\_\_
- 9.3.B. 1) Is there documentation to indicate the personnel listed above received the contingency plan? ☒ Yes ☐ No
- 9.3.F.(9, 10) g) If the contingency plan has been implemented, was a written report filed with the Commissioner and were the Commissioner and other required authorities properly notified before operations resumed? *N/A* Yes ☐ No ☐
- 6.5.A. 18. Does the facility retain copies of all manifests, annual reports, and test results for at least three years? *Facility has developed a manual and is keeping it. Keep 3 years.* ☒ Yes ☐ No
- 6.5.B. 19. Has the facility submitted an annual report for the preceding calendar year? ☒ Yes ☐ No

20. Comments

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inspector's Name: \_\_\_\_\_

*RENEE C. TYSON*

Title: \_\_\_\_\_

*Chemist*

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

*9/24/80*

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

CHECKLIST FOR RCRA INSPECTION OF TREATMENT,  
STORAGE & DISPOSAL (TSD) FACILITIES

Form "B" (VA)  
7/1/86

Name of Facility: Rehrig International  
Address: 901 North Lombardy Street  
Richmond, Virginia 23220  
EPA ID Number: VAD089028377  
Facility Inspection Representative: Bul Bauz  
Title: Planting Manager  
Telephone: (804) 355-7864

VA HWM Regs.  
Reference

1. The facility: treats, stores, disposes  
(Circle as appropriate)
- 9.1.C.1. 2. Does the facility receive hazardous waste from a foreign source? Yes ☒ No  
If yes, has the facility notified the Executive Director of the date of arrival? Yes No
- 9.1.D.(1, 2, 3) 3. Does the facility have a detailed chemical and physical analysis of a representative sample of the waste? ☒ Yes No
- 9.1.D.5. 4. Does the facility have a waste analysis plan which specifies the following: ☒ Yes No
  - a) the parameters for each hazardous waste; ☒ Yes No
  - b) test methods for each parameter; ☒ Yes No
  - c) the sampling method used to obtain a representative sample; ☒ Yes No
  - d) frequency to review initial analysis. ☒ Yes No
- 9.1.D.6. 5. If the facility receives wastes generated off-site, does the plan specify procedures and sampling methods to ensure that the waste matches the identity of the waste designated on the accompanying manifest or shipping paper? N/A Yes No
- 9.1.E.1. 6. Will physical contact or disturbance of the waste injure unknowing persons or livestock? ☒ Yes No

If yes, does the TSD facility have:

- 9.1.E.2.a. a) a 24-hour surveillance system which monitors and controls entry to the active portion of the facility? ☒ Yes ☐ No
- 9.1.E.2.a.(1) b) an artificial or natural boundary which surrounds active portions of the facility? and, ☒ Yes ☐ No
- 9.1.E.2.a.(2) c) a means to control entry at all times? (i.e., gates, attendants, locked entrances, etc.) ☒ Yes ☐ No
- 9.1.E.3. d) a restricted access sign posted at each entrance to the active portion of the facility? ☒ Yes ☐ No
- Is sign legible from a distance of 25 feet? ☒ Yes ☐ No
- Is sign in English and any other foreign language predominant to the geographical area? ☒ Yes ☐ No
- 9.1.F.2.a. 7. Does the TSD facility have a written schedule for inspecting all equipment necessary for prevention, detection or response to environmental or human health hazards? ☒ Yes ☐ No
- 9.1.F.2.c. a) Does the schedule identify the types of problems which are to be looked for during the inspection? ☒ Yes ☐ No
- 9.1.F.2.d. b) Does the schedule include frequency of these inspections? ☒ Yes ☐ No
- 9.1.G.1. 8. Have the facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? ☒ Yes ☐ No
- 9.1.G.2. 9. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? *This should be documented in the training outline.* ☒ Yes ☐ No
- 9.1.G.3. 10. Do personnel participate in an annual review of their initial training? ☒ Yes ☐ No
- 9.1.G.4.a. 11. Does the facility maintain a record of (a) job titles for personnel that are involved with hazardous waste management and (b) the name of the employee filling each job? *Plating* ☐ Yes ☒ No ✓

- 9.1.G.4.b. 12. Does the facility have on record a written position description for each job title noted in Question #11? *Please attach a copy of the position description* Yes ☒ No
- 9.1.G.4.c. 13. Does the facility maintain a written description of the type and amount of introductory and continuing training for those employees involved in hazardous waste management? *Please attach a copy of the training records* Yes ☒ No
- 9.1.G.4.d. 14. Does the facility have records to document this training? *Please attach a copy of the training records* Yes ☒ No
- 9.2.B. 9.2.D. 15. At the facility, is the following equipment installed:
- 9.2.B.1. a) An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? ☒ Yes ☐ No
- 9.2.B.2. b) A device at the scene of hazardous waste operations capable of summoning emergency assistance from Police, Fire departments, etc.? ☒ Yes ☐ No
- 9.2.B.(3, 4) c) Portable fire extinguishers, fire control, spill control, and decontamination equipment and water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system? ☒ Yes ☐ No
- 9.2.C. 16. Is a record of tests and inspections of required equipment (question 15) maintained at the facility? ☒ Yes ☐ No
- 9.2.E. 17. Does the facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? ☒ Yes ☐ No
- 9.3.A.1. 18. Does the facility have an established contingency plan to deal with any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to the air, soil, groundwater or surface water that may impact hazardous waste currently in storage at the facility? ☒ Yes ☐ No
- 9.3. 19. Does the contingency plan contain the following elements:



9.3.B.(1, 2)

- a) A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water?

☒ Yes ☐ No

9.3.B.3.

- b) A detailed description of arrangements formally agreed to by local police, fire departments, and state and local emergency teams to provide assistance during emergency situations?

☒ Yes ☐ No

9.3.B.4.  
9.3.E.

- c) A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators?  
List primary coordinator.

☒ Yes ☐ No

Name Bruce B. B. B.

Title Plant Manager

Telephone 365-7864

9.3.B.5.

- d) A list of all required emergency equipment necessary to cope with emergencies at the generator facility?

☒ Yes ☐ No

9.3.B.5.

- e) Does this list specify the location and of each item on the list, and a brief description of each item on the list, and a brief outline of its capabilities?

Yes ☒ No ☒

9.3.C.

- f) Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? List:

☒ Yes ☐ No

Richmond Fire Dept.  
\_\_\_\_\_  
\_\_\_\_\_

9.3.B.

- 1) Is there documentation to indicate the personnel listed above received the contingency plan?

☒ Yes ☐ No

- 9.3.F.(9, 10) g) If the contingency plan has been implemented, was a written report filed with the Executive Director and were the Executive Director and other required authorities properly notified before operations resumed? *N/A* Yes No
- 9.3.D. 20. Have any amendments of the contingency plan been necessary? If yes, explain in comment section. Yes ☒ No
- 9.4.B.2.e. 21. Does the facility retain copies of all manifests, and inspection results for at least three years? ☒ Yes No
- 5.4.E.1. 22. Does the TSD facility receive hazardous waste from off-site generators? Yes ☒ No
- 9.4.A. If yes, has the TSD determined:
- 5.5.C.2.a. a) That manifests are completed, signed, and dated by the generator and each transporter for all shipments received Yes No
- 5.5.C.2.b. b) That the manifest copies are signed and dated Yes No
- 5.5.C.2.d. c) A copy has been given to the transporter Yes No
- 5.5.C.2.e. d) A copy has been sent to the generator Yes No
- 5.5.C.2.f. e) A copy has been retained and filed at the TSD facility. Yes No
- 9.4.B. 23. Does the TSD facility have a written operating record which contains the following information: *N/A*
- For facility receiving off-site hazardous waste: *N/A*
- 9.4.B.2.a. a) A description of and the quantity of each hazardous waste received, and the method and date of treatment, storage or disposal? (Use Appendix 9.1) Yes No
- Storage \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_
- Treatment \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_
- Disposal \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_

For facilities disposing of hazardous waste:

- 9.4.B.2.b. b) The location of each hazardous waste within the facility and the quantity at each location recorded on a map or diagram of each cell or disposal area? N/A Yes No

For all TSD facilities:

- 9.4.B.2.c. c) Detailed records and results of waste analyses and incineration trial tests performed on wastes coming into the facility? N/A Yes No
- 9.4.B.2.d. d) Detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan? Yes No
- 9.4.B.2.e.  
9.1.F.4. e) Detailed records and results of inspections performed on facility emergency equipment, TSD systems, and hazardous waste areas? Yes No
- 9.4.B.2.f. f) Detailed monitoring, testing, and analytical data where required? Yes No
- 9.4.B.2.g. g) All closure cost estimates, and for disposal facilities all post-closure cost estimates? Yes No

Closure Cost Estimate \$ 9,900

- 9.6. 24. Does the facility have a written closure plan which includes:
- 9.6.C.1.b. a) An estimate of the maximum waste inventory in storage or treatment at any time during life of facility? Yes No
- 9.6.C.1.c. b) A description of steps that will be used to decontaminate facility equipment? Yes No
- 9.6.C.1.d. c) An estimate of the expected year for closure? Yes No
- 9.6.C.1.d. d) A schedule for final closure? Yes No ✓
- e) A copy of the closure plan given to the inspector? Yes No
- 9.7.C. 25. For all TSD facilities, has financial assurance for closure for this facility been established? Yes No

Instrument(s) used:

- ☐ Trust Fund
- ☐ Letter of Credit
- ☐ Performance Bond
- ☐ Financial Test
- ☒ Financial Guarantee Bond
- ☐ Certificate of Insurance
- ☐ Corporate Guarantee

26. Has a copy of all related documents been forwarded to the Virginia State Department of Health?

☒ Yes ☐ No

\* Submittal Date \_\_\_\_\_

If no, was a copy of these documents provided to the inspector?

☐ Yes ☐ No

If no, will a copy of these documents be mailed to the Virginia State Department of Health?

☐ Yes ☐ No

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.7.G.

27. Has liability coverage for sudden accidental occurrences\*\* been established for this facility?

☒ Yes ☐ No

Instrument(s) used:

- ☒ Certificate of Insurance
- ☐ Financial Test
- ☐ Liability Endorsement

28. Has a copy of all related documents been forwarded to the Virginia State Department of Health?

☐ Yes ☐ No

\* Submittal Date \_\_\_\_\_

\* If the financial test was used, all three (3) initially submitted items specified in § 9.7.C.5. must be updated within 90 days after the close of each succeeding fiscal year.

\*\* Sudden accidental occurrences: at least \$1 million per occurrence and \$2 million annual aggregate.

Non-sudden accidental occurrences: at least \$3 million per occurrence and \$6 million annual aggregate.

If no, was a copy of these documents provided to the inspector? Yes No

If no, will a copy of these documents be mailed to the Virginia State Department of Health? Yes No

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.6.H. 29. For landfills, surface impoundments, waste piles and land treatment facilities, does the facilities have a written post-closure plan that includes: N/A

9.6.H.1.a. a) Groundwater monitoring activities? Yes No

9.6.H.1.b. b) Maintenance activities to ensure containment? Yes No

9.6.H.1.c. c) Name, address, and phone number of contact during post-closure period? Yes No

d) Post-closure cost estimate? Yes No

Amount \$ \_\_\_\_\_

9.7.E. 30. For landfills, surface impoundments, waste piles and land treatment facilities, has financial assurance for post-closure care has been estimated? N/A Yes No

Instrument(s) used:

- ☐ Trust Fund
- ☐ Letter of Credit
- ☐ Performance Bond
- ☐ Financial Test
- ☐ Financial Guarantee Bond
- ☐ Certificate of Insurance
- ☐ Corporate Guarantee

31. Has a copy of all related documents been forwarded to the Virginia State Department of Health? N/A Yes No

\* Submittal Date \_\_\_\_\_

\* If the financial test was used, all three (3) initially submitted items specified in § 9.7.C.5. must be updated within 90 days after the close of each succeeding fiscal year.

If no, was a copy of these documents provided to the inspector?

Yes No

If no, will a copy of these documents be mailed to the Virginia State Department of Health?

Yes No

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.7.G.2.

32. For landfills, surface impoundments and land treatment facilities has liability coverage\*\* for nonsudden accidental occurrences been established? *N/A*

Yes No

Instrument(s) used:

- ☐ Certificate of Insurance
- ☐ Financial Test
- ☐ Liability Endorsement

33. Has a copy of all related documents been forwarded to the Virginia State Department of Health? *N/A*

Yes No

\* Submittal Date \_\_\_\_\_

If no, was a copy of these documents provided to the inspector?

Yes No

If no, will a copy of these documents be mailed to the Virginia State Department of Health?

Yes No

Date by which a copy of these documents is to be mailed. \_\_\_\_\_

9.5.

34. For landfills, surface impoundments, wastepiles (if closed as landfills) and land treatment facilities, has a groundwater monitoring program been implemented? *N/A*

Yes No

9.4.D.

35. Has an annual report been filed?

Yes No

\* If the financial test was used, all three (3) initially submitted items specified in § 9.7.C.5. must be updated within 90 days after the close of each succeeding fiscal year.

\*\* Sudden accidental occurrences: at least \$1 million per occurrence and \$2 million annual aggregate.

Non-sudden accidental occurrences: at least \$3 million per occurrence and \$6 million annual aggregate.

36. Comments:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inspector's Name: BENEE C. Tyson

Title: Chemist

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: 9/24/86

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

7/1/86

CHECKLIST FOR RCRA INSPECTION OF USE  
AND MANAGEMENT OF CONTAINERS

Name of Facility: Rehrig International  
Address: 901 North Lombardy Street  
Richmond, Virginia 23220  
EPA Generator ID Number: VAD089028377  
Facility Inspection Representative: Paul Buz  
Title: Plant Manager  
Telephone Number: (804) 355-7844

The questions contained in this checklist apply to owners and operators of all hazardous waste facilities and generators accumulating less than 90 days (see § 6.4.E.1.a. that store containers of hazardous waste, except as § 9. provides otherwise.

VA HWM Regs.  
Reference

- |                        |   |                                      |    |
|------------------------|---|--------------------------------------|----|
| 9.8.B.                 | 1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?  | <input checked="" type="radio"/> Yes | No |
| 9.8.C.                 | 2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes? | <input checked="" type="radio"/> Yes | No |
| 9.8.D.1.               | 3. Are all containers holding hazardous waste kept closed during storage?   | <input checked="" type="radio"/> Yes | No |
| 9.8.E.                 | 4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week?  | <input checked="" type="radio"/> Yes | No |
| 9.1.F.2.a.<br>9.1.F.4. | 5. Is an inspection log maintained? (See question #7 of TSD checklist.)   | <input checked="" type="radio"/> Yes | No |
| 9.8.F.                 | 6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?  | <input checked="" type="radio"/> Yes | No |
| 9.8.G.1.               | 7. Are incompatible wastes placed in separate containers? (See APPENDIX 9.4 for examples of incompatible waste). <u>N/A</u>   | Yes                                  | No |



9.8.G.3.

8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? *N/A*

Yes No

9. Comments:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inspector's Name:

*RENEE C. TYSON*

Title:

*Chemist*

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection:

*9/26/86*

Inspector's Name:

Title:

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection:

**OCTOBER 16, 1986**

**INTERNAL MEMO – USEPA REGION III**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection - *Rehig International, Richmond VA*  
*VAD089028377*

DATE: *10/16/86*

FROM: Traci I. Self, Environmental Engineer *TIS*  
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

TO: FILE

THRU: John A. Armstead, Chief  
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS  
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE  
VIOLATIONS.

*Class II - CUPC - No schedule for closure*

*Class II - CUPC - Incomplete Training Records*

**JUNE 2, 1988**

**RCRA INSPECTION**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection

DATE:

6/2/88

Facility: ~~Delmarva Environmental~~

ID #: ~~VTD 039 000 000~~

FROM: Charlene C. Harrison, Environmental Engineer  
DELMARVA/DC/WV RCRA Enforcement Section (3HW15)

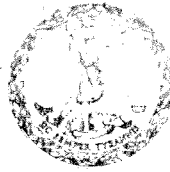
TO: FILE

THRU: Victoria P. Binetti, Chief <sup>6/2/88</sup>  
DELMARVA/DC/WV RCRA Enforcement Section (3HW15)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR  
THE FACILITY REFERENCED ABOVE, I HAVE DETERMINED THAT  
NO FURTHER ACTION IS REQUIRED AT THIS TIME.

**MARCH 24, 1989**

**LETTER FROM VIRGINIA DEPARTMENT OF WASTE MANAGEMENT TO  
REHRIG INTERNATIONAL**



1 B. 11  
2 File  
TSD

# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF WASTE MANAGEMENT

11th Floor, Monroe Building

101 N. 14th Street

Richmond, VA 23219

(804) 225-2667

MAR 24 1989

CERTIFIED - RETURN  
RECEIPT REQUESTED

Paul Bauz, Plating and Waste Manager  
Rehrig International  
901 North Lombardy Street  
Richmond, Virginia 23220

Dear Mr. Bauz:

The closure plan for your facility was received by the Department on February 28, 1989. With the enclose notice of public comment to be published in the Richmond Times Dispatch, the Department is initiating the administrative action required under Sections 9.6 and 11.3 of the Virginia Hazardous Waste Management Regulations regarding closure and termination of interim status. We are also providing a copy of the fact sheet prepared for this comment period.

If you have any questions, please contact Glenn Moore at (804) 225-3754.

Sincerely,

  
Karol A. Akers, Technical Service Chief  
Division of Technical Services

Enclosure...

cc: William H. Schremp, EPA ✓

FACT SHEET

Notice of Closure and Termination of Interim Status

Name and Address of Applicant:

Mr. Paul Bauz  
Rehrig International, Inc.  
901 North Lombardy Street  
Richmond, Virginia 23220

Name and Address of Facility:

Rehrig International, Inc.  
901 North Lombardy Street  
Richmond, Virginia 23220

EPA I D #:

VAD089028377

Description of Facility and Action:

The above facility has, since November 19, 1980, operated a hazardous waste management facility subject to regulations promulgated under the Resource Conservation and Recovery Act. This facility qualified for interim status for storage of hazardous waste in containers, which is conferred in the Act and allows a facility to operate until final disposition of its permit application. On April 1, 1988, the Department of Waste Management requested from this facility its complete permit application. By letter of October 13, 1988, the facility indicated that it would no longer operate as a hazardous waste management facility, so it would not be submitting the permit application. A closure plan, submitted on February 24, 1989, provides for closure of this hazardous waste management facility. The action proposed is approval of the closure plan under Section 9.6 and termination of interim status under Section 11.3 of the Virginia Hazardous Waste Management Regulations.

Comment Period: April 15, 1989 through May 14, 1989.

The closure plan can be viewed at the address given below and at the Rehrig International, Inc. facility. All persons, including the applicant, who believe that the proposed action is inappropriate must raise all ascertainable issues and submit all available arguments and factual grounds supporting their position by May 14, 1989. Two Copies of such documents should be sent to the Department of Waste Management, Division of Technical Services, Eleventh Floor, Monroe Building, 101 North Fourteenth Street, Richmond, Virginia 23219

Contact:

Department of Waste Management  
Division of Technical Services  
Attention : Glenn Moore  
Eleventh Floor, Monroe Building  
101 North Fourteenth Street  
Richmond, Virginia 23219  
Phone (804) 225-3754



COMMONWEALTH OF VIRGINIA  
DEPARTMENT OF WASTE MANAGEMENT, DIVISION OF TECHNICAL SERVICES  
NOTICE OF TERMINATION OF INTERIM STATUS AND  
OPPORTUNITY TO COMMENT ON CLOSURE PLAN  
FOR REHRIG INTERNATIONAL, INC.  
RICHMOND, VIRGINIA

Pursuant to the authority granted to the Board of Waste Management by Section 10-1427 of Title 10.1 of the Code of Virginia (1950), as amended, notice is given of a public comment period, to last until May 14, 1989.

During this period, any interested person may submit written comments on the closure plan and proposed termination of interim status. Any request for public hearing on this action must be in writing and must state the nature of the issues to be raised.

The closure plan may be viewed at the address given below and at Rehrig International, Inc. Written comments may be sent to, and copies of the fact sheets obtained from the Department of Waste Management, Division of Technical Services, 101 North Fourteenth Street, Richmond, Virginia 23219. For more information call Glenn Moore at (804) 225-3754.

**AUGUST 2, 1989**

**PRELIMINARY ASSESSMENT OF REHRIG INTERNATIONAL**



# COMMONWEALTH of VIRGINIA

DEPARTMENT OF WASTE MANAGEMENT  
11th Floor, Monroe Building  
101 N. 14th Street  
Richmond, VA 23219  
(804) 225-2667

## PRELIMINARY ASSESSMENT

OF

REHRIG INTERNATIONAL, INC.  
VA-472

VAD 089028377

Submitted By:

Commonwealth of Virginia  
Department of Waste Management

August 2, 1989

Prepared By:

*Kathleen I. Bartholomew*

Kathleen I. Bartholomew  
Environmental Program Analyst  
Superfund Program  
Department of Waste Management

Reviewed By:

*P. W. Kohler*

Paul W. Kohler  
HRS Supervisor  
Superfund Program  
Department of Waste Management

Approved By:

*T. D. Modena*

Thomas D. Modena  
Pre-remedial Program Manager  
Superfund Program  
Department of Waste Management

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## 1.0 INTRODUCTION

### 1.1 Site Location

Rehrig International, Inc. is located in Richmond, Virginia at 901 N. Lombardy Street. Approximate site coordinates are 77° 27' 15" W. longitude and 37° 33' 23" N. latitude (see figure 1, Richmond, Virginia, 7.5 minute topographic quadrangle, 1981).

### 1.2 Site History

Rehrig has been in business since 1980. They plate and assemble shopping carts and hand baskets and produce approximately one quarter of a million units annually. They have been operating as a RCRA interim status storage facility since 1981. The last RCRA inspection was conducted March 16, 1989. The RCRA permit is required due to the low level concentrations of nickel and chromium contained in the filter press cake stored on site. A closure plan has been submitted to the Department of Waste Management (DWM) for the drum storage area. Termination of the facility's interim status is expected to occur by September 1989. A Preliminary Assessment of the Rehrig facility was conducted on June 15, 1989 by DWM personnel.

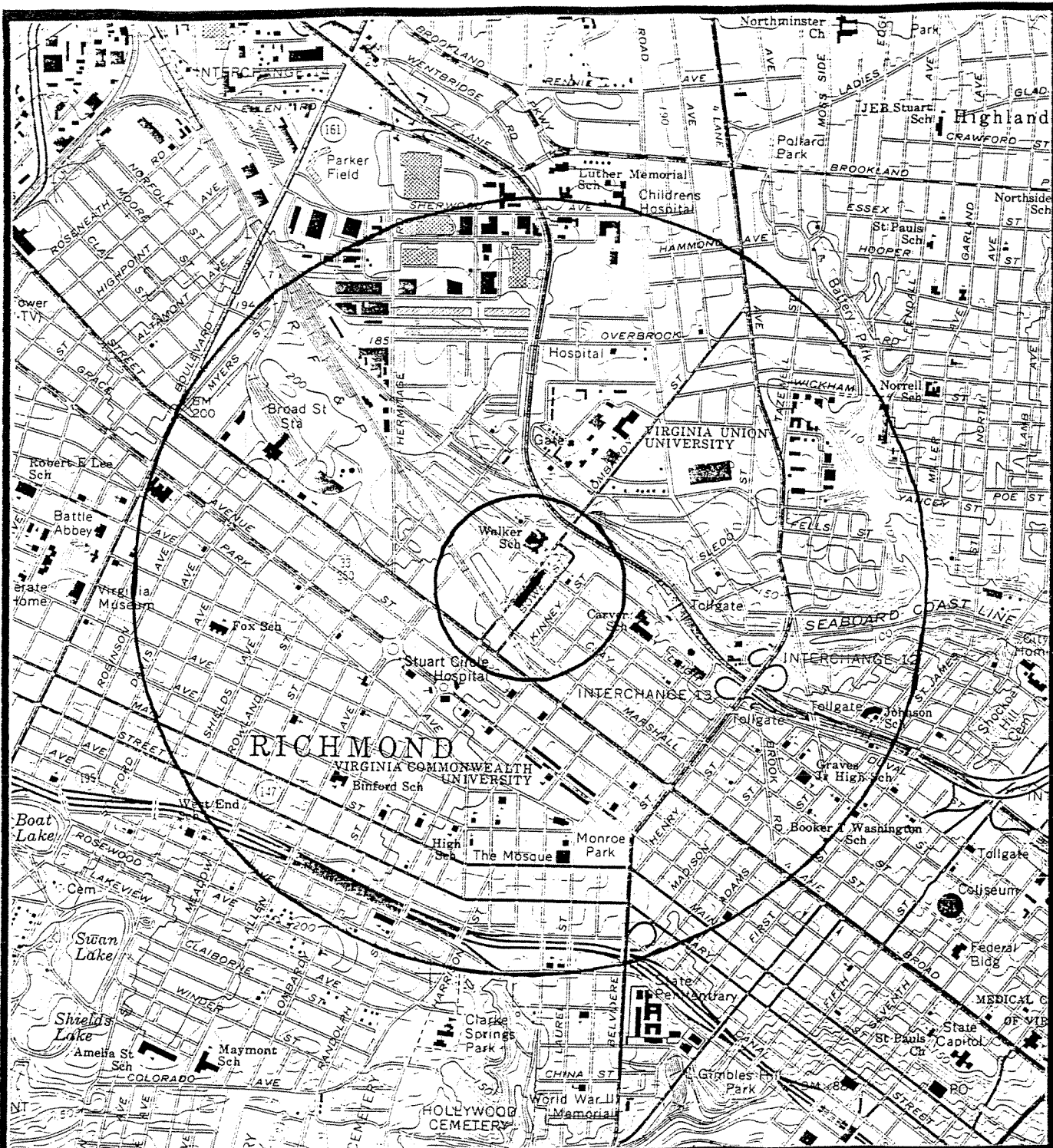
### 1.3 Site Layout

The Rehrig building is approximately 250,000 square feet. The upstairs houses the offices and on the ground level are the plating and assembly operations. Figure 2 shows the overall plant layout with drum storage area noted, and figure 3 is a detail of the plating operation.

## 2.0 ENVIRONMENTAL SETTING

### 2.1 Population

A four mile radius of the site includes portions of Richmond City and Henrico County. The approximate population within a 1 mile radius is 2,870, within a 2 mile radius 11,478, within a 3 mile radius 25,826, and within a 4 mile radius 45,912. These approximate populations were determined using the following formula:  $\text{population/mile}^2 \times \pi \times \text{radius}^2$  where population/mile<sup>2</sup> is based on the 1980 census data for Richmond, Virginia.



## Commonwealth of Virginia

FACILITY LOCATION MAP  
 REHRIG INTERNATIONAL, INC. VA-472  
 RICHMOND, VA 7.5' USGS TOPOGRAPHIC QUADRANGLE 1981

Figure Number:  
 1

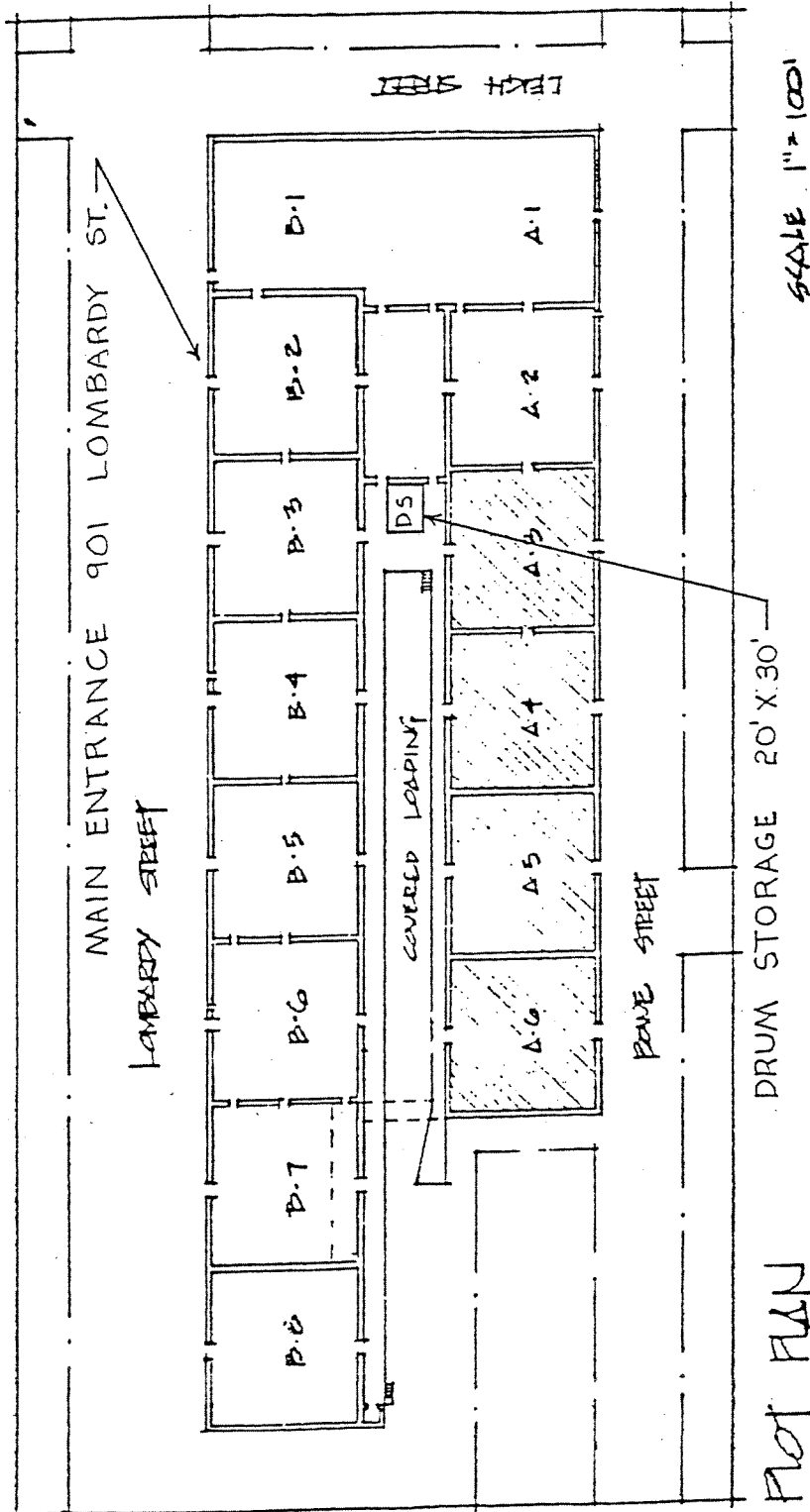
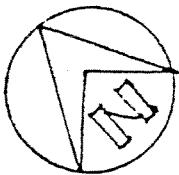
Revised:

Revised:

Drawn By:

Reviewed:

Date:  
 7/14/89

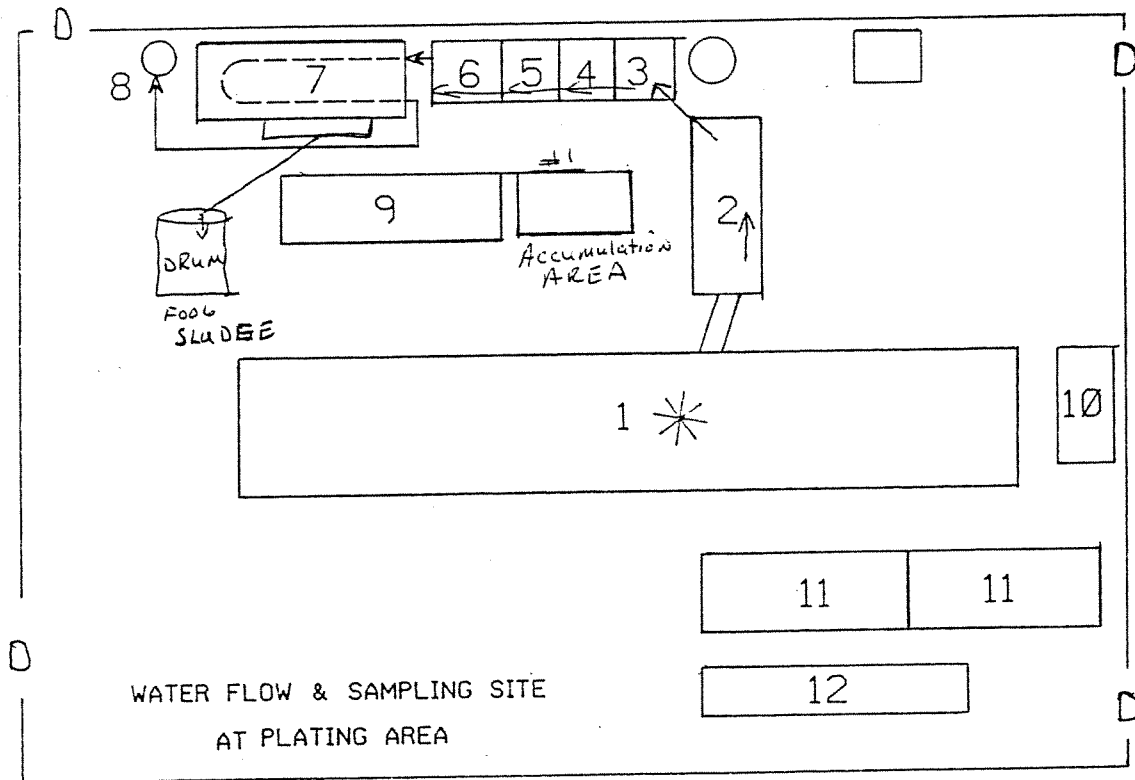


PLANT LAYOUT REHRIG INTER. VA-472 RICHMOND, VIRGINIA		Figure Number: 2
Drawn by:	Reviewed:	Date: 7/14/89



Commonwealth of Virginia

# REHRIG INTERNATIONAL



1. NICKLE-TRICHROME plating process
  2. Receiving tank for all water from No.1
  3. thru 7. Wastewater treatment process
  8. Discharge site to city & sampling site for city & lab
  9. Trichrome emergency tank
  10. Acid emergency tank
  11. Nickle emergency tank
  12. Cleaner emergency tank
- \* No.1 has retaining dike for emergency spillage or leaks  
D Doorways



## Commonwealth of Virginia

PLATING OPERATION  
REHRIG INTERNATIONAL, INC. VA-472  
RICHMOND, VIRGINIA

Figure Number:  
3

Revised:

Revised:

Drawn By:

Reviewed:

Date:  
7/14/89



## 2.2 Land Use

Land use surrounding Rehrig is a combination of residential, commercial/industrial, and community services. Directly north of the site, within a one mile radius, are two schools, two hospitals and I-95. East of Rehrig, within a one mile radius, is a school, I-95, a residential/commercial area, and Seaboard Coast Line RR. South of Rehrig, within a one mile radius, is a hospital, Virginia Commonwealth University, a school, and a residential/commercial area. West of the site, within a one mile radius, is a residential/commercial area, a school, and a museum.

## 2.3 Climate and Topography

The Rehrig site is at an approximate elevation of 180 feet (MSL). The topography is generally flat. Average annual rainfall, as recorded by NOAA (1980) at the Richmond WSO AP station, is 3.84 inches (9.75 cm) and the average temperature is 58.4°F (14.7°C).

## 2.4 Geology

The Rehrig facility is located in the Fall Zone between the Piedmont and Coastal Plain Physiographic Provinces. This is a transitional zone up to 10 miles wide where the thin, younger Coastal Plain sediments begin to cover the older Piedmont rocks.

The basement rock for this area is the Petersburg granite. In the Fall Zone the Petersburg is overlain by Miocene marine transgressive sediments or younger Tertiary - Quaternary regressive sediments or both. Transgressive sediments are described as drab-gray, bluish-gray, and greenish-gray silts, clays, and silty clays commonly well consolidated with some plant fragments and occasional shell beds. Regressive sediments are described as light- to bright-colored oxidized sediments, mainly sands and gravels with some clay (Daniels and Oruschak, 1974).

## 3.0 HYDROLOGY

### 3.1 Ground Water

Ground water quality within the Fall Zone is generally good except for some areas where high iron concentrations pose a problem. Pumping rates up to 10 gallons per minute (gpm) are common with rates of 100 gpm possible. Most wells in the Fall Zone are drilled through the thin Coastal Plain deposits and are completed in the underlying bedrock.

### 3.2 Surface Water

Surface water run-off from the facility goes into storm sewers that lead to the sewage treatment plant. The run-off from the site comes from water coming off the roof of the building and the surrounding sidewalk.

The James River is approximately 1.6 miles south of the facility. The river is used for recreational, industrial and municipal water supply purposes.

### 3.3 Water Supply

According to Meade Anderson of the State Water Control Board Piedmont Regional Office, the water supply, within a three mile radius of the site, is obtained from the city of Richmond. There is an intake pipe, for the city water supply, on the James River approximately 3 miles upstream and southwest of the site.

## 4.0 WASTE TYPES AND QUANTITIES

The solid wastes produced from Rehrig's operation are sludge from the nickel plating tank, filter press cake from the water treatment system, and metal chips from cleaning the metal parts holders that dip the metal pieces into the plating tanks.

The sludge from the nickel plating tank is produced when nickel precipitates out of solution and accumulates on the bottom of the tank. The accumulated sludge is cleaned out of the tank once a week. The quantity of sludge produced is approximately one quarter of a drum per week or one drum per month. The filter press is also cleaned weekly and fills from 1.5 to 2 drums each week. The metal parts holders are scraped when necessary and the metal chips are put into the drum with the filter cake solids and dried nickel plating sludge. Layers of absorbent material are also placed into each drum to ensure that no leakage occurs. Because of the facility's interim status, the drums are now removed only as necessary, however, after their interim status is terminated, they will be classified as a generator and can store the drums for only 90 days or less.

Extraction Procedure Toxicity (EP Toxicity) tests, for metals, are run on the waste stored in the drums once a year, as required in the waste characterization section of their RCRA permit. The average concentrations of chromium and nickel for the last three years has been 97 ppm and 1927 ppm respectively. All other EP Toxicity metals were at concentrations below regulatory limits.

In November of 1988, 86 drums were transported by Envirosafe Services of Ohio to Chem-Met Services in Wyandotte, MN. At the time of the last RCRA inspection in March 1989 there were 80 + drums on site. The facility is reported to generate approximately 4,800 pounds of this type of waste a month.

#### 4.1 Solid Waste Management Units (SWMU's)

Four SWMU's have been identified for this site. They are as follows:

- SWMU No. 1: Nickel plating sludge drying drum
- SWMU No. 2: Filter press cake bin
- SWMU No. 3: 55 gallon storage drum with filter press cake, dried nickel plating sludge, metal chips from cleaning the metal holder, and absorbent material
- SWMU No. 4: Drum storage area

##### 4.1.1 SWMU No. 1

###### Nickel Plating Sludge Drying Drum

This drum is located next to the nickel plating tank. As the nickel drops out of the plating solution it accumulates on the bottom of the tank as a sludge. Once a week the sludge is removed and put into the drum to dry. Once it has dried, it is put into a 55 gallon drum.

##### 4.1.2 SWMU No. 2

###### Filter Press Cake Bin

This SWMU is located underneath the filter press at the end of the waste water treatment process. It is a catch basin for the pressed filter cake that comes out of the filter press.

The waste water from the plating process goes through four stages of treatment. In the first stage, the pH of the waste water is adjusted with lime to between 8.5 and 10. In the second stage, a flocculent is added, in the third phase a coagulating agent is added, and in the fourth stage the treated wastewater goes to a settling tank. The treated waste water then goes through a filter press to remove all solids. After the treatment process is completed, the wastewater goes to the wastewater treatment plant (WWTP) through the city's sewer system.

When the filter press has reached capacity, it is emptied of all pressed filter cake. This is accomplished by scraping the filter cake off the filters. It falls into a catch basin directly underneath the press. It is then put into a 55 gallon drum, which is SWMU No. 3.

#### 4.1.3 SWMU No. 3

##### 55 Gallon Storage Drum

SWMU No. 3 is located near the filter press catch basin. It contains the dried nickel plating sludge, the filter press cake, and any metal chips that are scraped off the metal parts holders. Layers of an absorbant material are also put in this drum to ensure that it doesn't leak.

#### 4.1.4 SWMU No. 4

##### Drum Storage Area

SWMU No. 4 is located near the loading dock (see figure 3). It is a concrete pad where full SWMU No. 3 drums are stored until they are picked up for transport to a TSD facility. The concrete pad is fenced in and is secured with a lock. At the time of the last RCRA inspection, March 16, 1989, there were approximately 80 drums in this area.

### 5.0 EXPOSURE ASSESSMENT

#### 5.1 Ground water

Ground water contamination resulting from processes at Rehrig is not expected. All plating tanks have concrete containment systems. All processes are located inside the building and only run-off from the roof and sidewalk could potentially reach ground water by seepage. According to the State Water Control Board, there are no ground water wells within a three mile radius of the facility.

#### 5.2 Surface water

Surface water contamination resulting from processes at Rehrig is not expected. All plating tanks have concrete containment systems. All processes are located inside the building and only run-off from the roof and sidewalk could potentially reach surface water. However, the facility is located in downtown Richmond which has a combination storm water/sewer drainage system so any runoff from the site is likely to be diverted to the waste water treatment plant before reaching any surface water. The James River is the closest surface water to the facility and it is approximately 1.6 miles south of the facility.

#### 5.3 Direct contact

There is potential for direct contact with the drying nickel plating sludge and the filter press cake because they are in open containers.

#### 5.4 Food chain

Food chain contamination resulting from processes at Rehrig is not expected. The building is completely enclosed and the drums are in a fenced, secured area, therefore, the potential for a release that would eventually end up in the food chain is not expected.

#### 5.5 Air contact

There is no possibility of air contact with compounds used in the plating process because none are volatile.

#### 6.0 CONCLUSION

This facility has been ranked as a "no further action" site. This is based on the fact that all systems associated with the chromium and nickel plating operation have sufficient containment surrounding them, and all drains located in the plating area lead to the facility's waste water treatment system and eventually to the city WWTP.

#### REFERENCES

Geology of the Studley, Yellow Tavern, Richmond, and Seven Pines  
7.5 minute Quadrangles, Virginia

Daniels, P. A., Jr., and Onuschak, Emil, Jr., 1974, Geology of the  
Studley, Yellow Tavern, Richmond, and Seven Pines Quadrangles,  
Virginia: Virginia Division of Mineral Resources Rept. Inv.  
38, 75 p.

Virginia Water Control Board: Ground Water Map of Virginia, 1985

APPENDIX A  
EPA PRELIMINARY ASSESSMENT FORM



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER  
VA 472

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Rehrig International Corp.		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 901 North Lombardy Street			
03 CITY Richmond	04 STATE VA	05 ZIP CODE 23220	06 COUNTY	07 COUNTY CODE	08 CONG DIST
09 COORDINATES LATITUDE 37° 33' 23" N		LONGITUDE 77° 27' 15" W		Richmond, VA quadrangle, USGS topographic 7.5 minute series 1981	

10 DIRECTIONS TO SITE (Starting from nearest public road)

Heading west on Broad st., go approximately 6 tenths of a mile past S. R. 301 to Lombardy St. and take a right.

III. RESPONSIBLE PARTIES

01 OWNER (If known) Mr. C. N. Schumann		02 STREET (Business, mailing, residential) H. B. P. Associates 7737 Jahnke Road			
03 CITY Richmond	04 STATE VA	05 ZIP CODE 23225	06 TELEPHONE NUMBER ( )		
07 OPERATOR (If known and different from owner) Paul Bauz-Plating Manager		08 STREET (Business, mailing, residential) 901 N. Lombardy St.			
09 CITY Richmond	10 STATE VA	11 ZIP CODE 23220	12 TELEPHONE NUMBER 804 355-7864		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN					

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 3001 DATE RECEIVED: 09/05/89 ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: \_\_\_\_\_ ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 06/15/89 <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1980 BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN			

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Trivalent chromium and nickel present in filter cake and dried sludge.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Potential for nickel and chromium contamination of surrounding environment exists but is minimal due to the facility processes being totally enclosed within a building and the use of a four step treatment of waste water before it is discharged to the Richmond sewer system.

V. PRIORITY ASSESSMENT

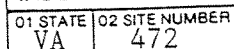
01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)

☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time available basis) ☒ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Paul Kohler		02 OF (Agency, Organization) Department of Waste Management		03 TELEPHONE NUMBER 804 225-2860	
04 PERSON RESPONSIBLE FOR ASSESSMENT K. S. Bartholomew		05 AGENCY DWM	06 ORGANIZATION Superfund	07 TELEPHONE NUMBER 804 225-2858	08 DATE 06/15/89





☐ I. HIGHLY VOLATILE  
☐ J. EXPLOSIVE  
☐ K. REACTIVE  
☐ L. INCOMPATIBLE  
☐ M. NOT APPLICABLE

EPA FORM 2070-12 (7-81)



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE VA 02 SITE NUMBER 472

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None expected or observed. All plating tanks have concrete containment systems.  
All processes are located inside the building and only run-off from the roof  
and sidewalk could potentially reach the ground water by seepage.

01 ☐ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None expected or observed. All plating tanks have concrete containment systems.  
All processes are located inside the building and only run-off from the roof  
and sidewalk could potentially reach surface water.

01 ☐ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None expected or observed. Compounds used in plating process do not volatilize.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None expected or observed. Compounds used in process are not flammable or ignitable.

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

Drums containing drying nickel plating sludge and filter press cake are open  
and therefore there is potential for direct contact.

01 ☐ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 AREA POTENTIALLY AFFECTED: \_\_\_\_\_ (Acres) 04 NARRATIVE DESCRIPTION

None expected or observed. The waste is inside the building in a fenced, secured  
area. There is no on site disposal.

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None expected or observed. Drinking water for the 3 mile area surrounding the  
site is from the Richmond municipal water supply. The intake for this supply  
is located on the James River 3 miles upstream of the site.

01 ☐ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 WORKERS POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

Drums containing the drying nickel plating sludge and the filter press cake are  
open and therefore there is potential for worker exposure.

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None expected or observed. The waste is inside the building in a fenced, secured  
area.



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER  
VA 472

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

None expected or observed. All processes are located inside the building. Drums are transported directly to a licensed TSD facility.

01 ☐ K. DAMAGE TO FAUNA  
04 NARRATIVE DESCRIPTION (include name(s) of species)

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

None expected or observed. All processes are located inside the building. Drums are transported directly to a licensed TSD facility.

01 ☐ L. CONTAMINATION OF FOOD CHAIN  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

None expected or observed. All processes are located inside the building. Drums are in a fenced, secured area. Potential for a release that would end up in the food chain is not to be expected.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES  
(Spills/runoff/standing liquids/leaking drums)  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

Potential for spillage of contents of open drums, however, any liquid would go to a drain leading directly to the waste water treatment system and any solids would be swept up and put back into the drum.

01 ☐ N. DAMAGE TO OFFSITE PROPERTY  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

None expected or observed. All processes are located inside the building. Drums are in a fenced, secured area and are transported to a licensed TSD facility.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

None expected or observed. All drains that could possibly come in contact with any waste are routed through the waste water treatment system first.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

None expected or observed. Drums are manifested during transport and are taken to a licensed TSD facility.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

Rehrig has had numerous RCRA violations which pertained to some sort of documentation. None of them relate to a release of any kind.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 2,870 within one mile

IV. COMMENTS

V. SOURCES OF INFORMATION (Cite specific references, e. g., state files, sample analysis, reports)

Paul Bauz-Plant  
RCRA files  
Glenn Moore, DWM RCRA

# FIELD TRIP SUMMARY REPORT

This summary should be prepared in conjunction with the Preliminary Assessment, EPA Form 2070-12.

EPA Case Number VA - 472 Site Name Rehrig International, Inc

## Site Description

Rehrig International, Inc. Plates metal parts and makes the plastic components for shopping carts and hand baskets. They are a RCRA regulated facility operating under interim status. They store filter-press cake, dried sludge and metal chips, from their process, in drums. The drums are periodically removed to a regulated treatment, storage, and disposal (TSD) facility.

Area of site (acres)

Approximately 6

Hazardous portion, if not entire site

Drum Storage area

Description of processes/operations which took place at the site  
Plating and assembly of shopping carts and hand baskets. Waste water from the plating process is treated in four stages, filtered and sent to the Richmond waste water treatment plant (WWTP).

## Waste handling/disposal practices

There are four Solid Waste Management Units (SWMU's) on site. The nickel plating sludge drying drum, the filter press cake bin, the 55 gallon drum where the dried nickel plating sludge, the filter cake and the metal chips are consolidated, and the drum storage area. The drums are periodically transported to TSD facility.

## Site topography and runoff drainage pathways

Site is flat. Processing areas are located inside the building; therefore, there are no drainage pathways except piping inside the building. All piping goes to WWTP.

Surface or subsurface drainage areas (leachate) noted?

All facility drainage goes to the WWTP via sewer system. All surface runoff from roof and sidewalk goes to the WWTP via sewer system.

Odors/stains noted?

None

Stressed vegetation noted?

None

Location and description of streams or receiving waters adjacent to site. Include flow direction and observations. Note location on attached map.

The James River is located approximately 1.6 miles south of the facility and flows east for approximately 2 miles and then turns and flows south. Contamination of the river from any spillage at the facility is not expected.

Monitoring wells on site or in vicinity. Note location on attached map.

There are no monitoring wells on site or within a three mile radius of the site.

Population within 1/2 mile of site:

- ☐ 0-10  
☐ 10-100  
☒ greater than 100

Population within 1 mile of site:

- ☐ 0-10  
☐ 10-100  
☐ 100-1000  
☒ greater than 1000

Surrounding land use (woodlot, agricultural, recreation, industrial, etc.)

NORTH Industrial, residential/commercial, recreational, and community services

EAST Industrial, residential/commercial, recreational, and community services

SOUTH Industrial, residential/commercial recreational, and community services

WEST Industrial, residential/commercial recreational, and community services

Municipal water supply within 3-mile radius (note use of surface water and/or wells)

The water supply within a 3 mile radius is provided by the City of Richmond. There is an intake pipe for the city water supply on the James River. It is located approximately 3 miles upstream and southwest of the facility.

Reference: Meade Anderson - State Water Control Board, Piedmont Regional Office.

Domestic wells. Approximate number within 1/2 mile: 0  
 List nearest wells below and show locations on attached map.

Owner/Resident	Address	Phone

Groundwater flow direction, if known

Suspected to flow south towards the James River.

Description of odor/taste problems

None

State inspection activity (including permits held)

The plant is operating under a RCRA interim status permit. The last RCRA inspection was conducted March 16, 1989

State/Federal/Private remedial activities

None

## Additional comments--Further description of site

A closure plan has been submitted to the VA. DWM. The facility plans to close by September, 1989 at which time their interim status will be terminated. Once their interim status is terminated they will be classified as a generator and will be allowed to store the drums on site for only 90 days or less.

## SITE CONTACTS

Name and Title	Affiliation	Phone
Paul Bauz	Plant Manager	(804) 355-7864

## INSPECTION INFORMATION

Name and title of inspector(s) K. I. Bartholomew, Glenn Moore, and Russell Dudley

Agency VA. Dept. of Waste Management Phone number 225-2858

Date 15 June 1989 Time on site 0900

Weather conditions:

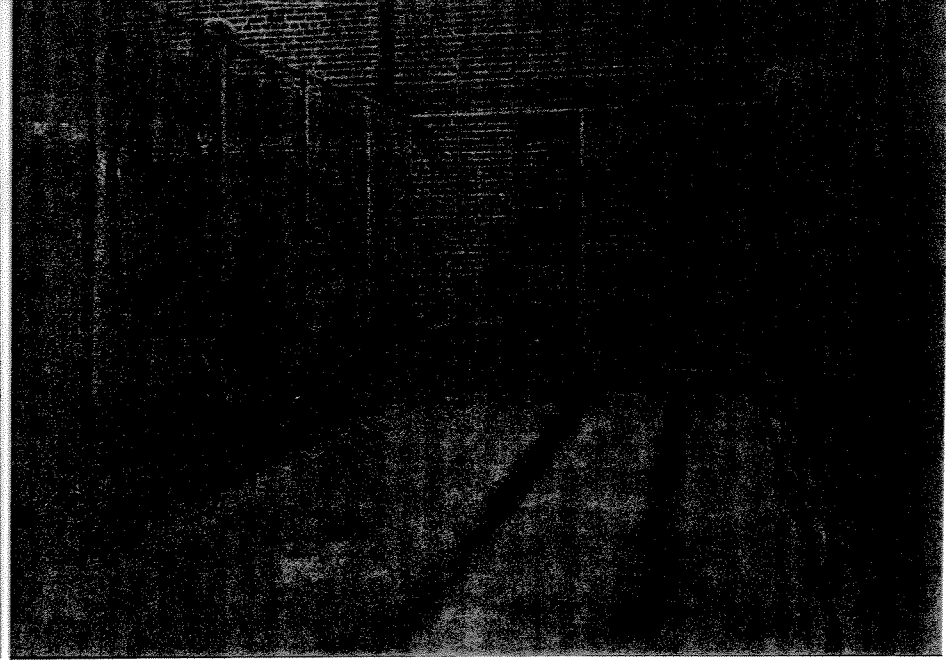
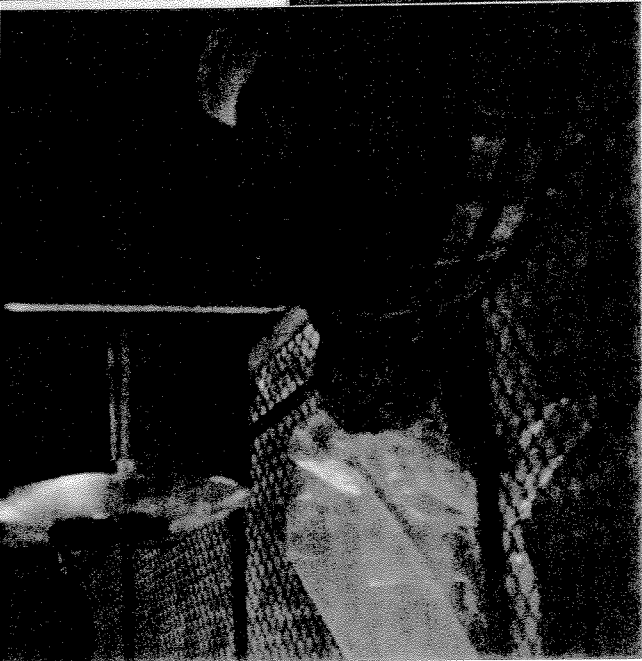
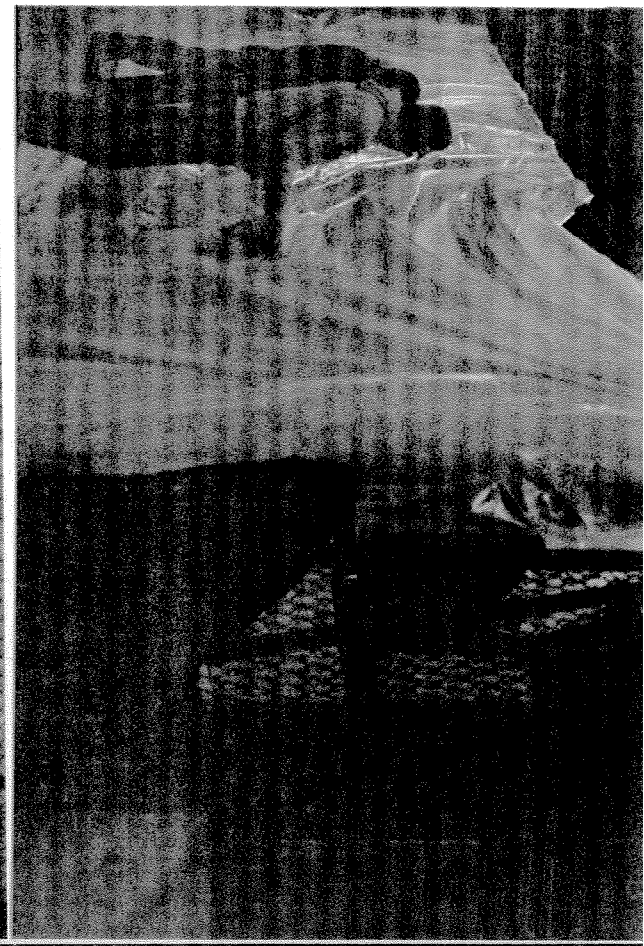
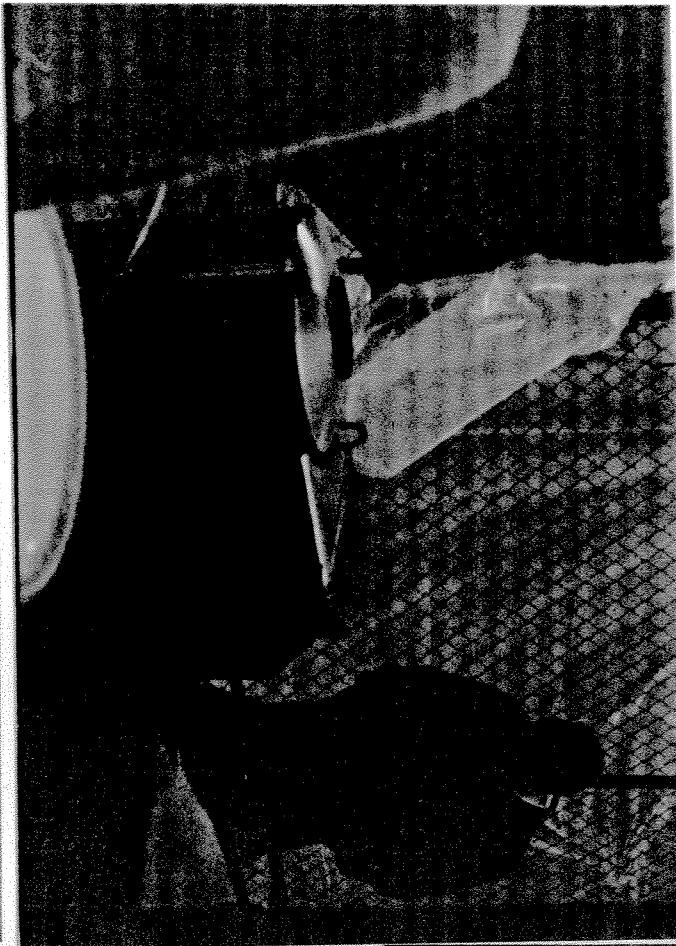
Sunny, clear 85°F

## ATTACHMENTS

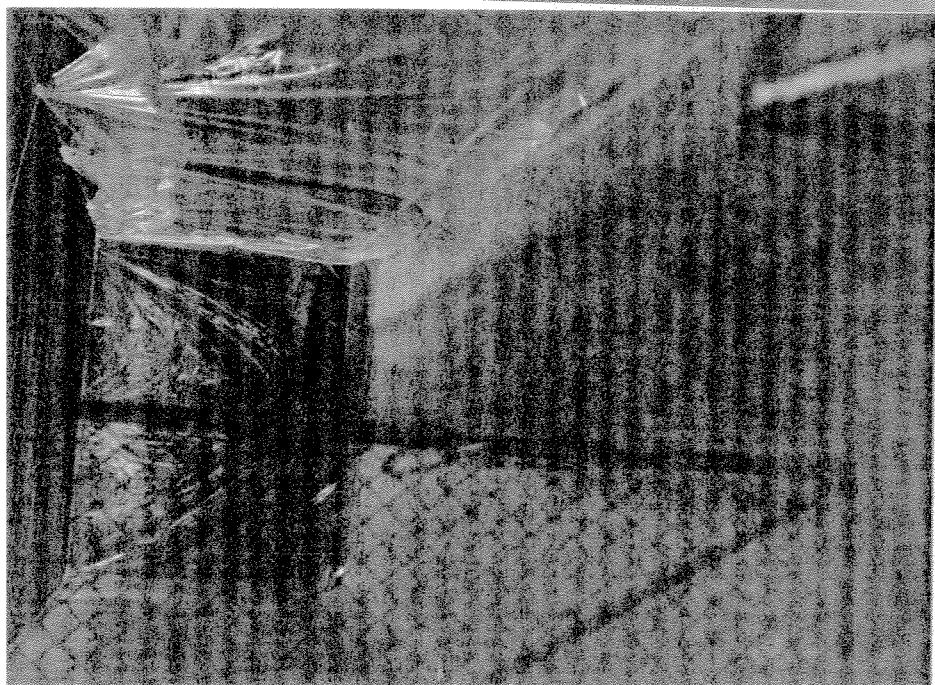
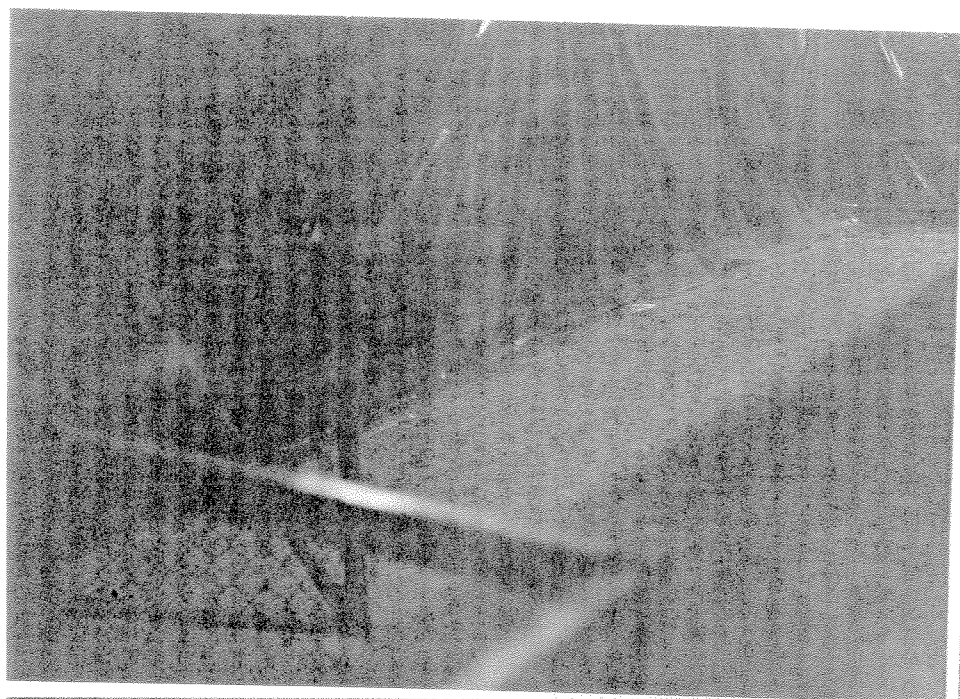
- o Topographic map identifying site location. Include name of quadrangle map.
- o Site sketch map showing location of monitoring wells, domestic wells, municipal water supplies, and areas of concern (lagoons, leachate seeps, drums, etc.)
- o Any available sampling results or state monitoring data with map showing sample locations.

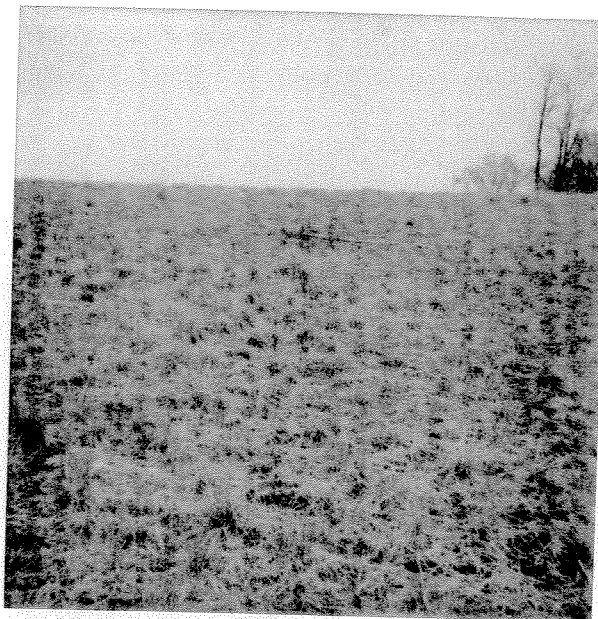










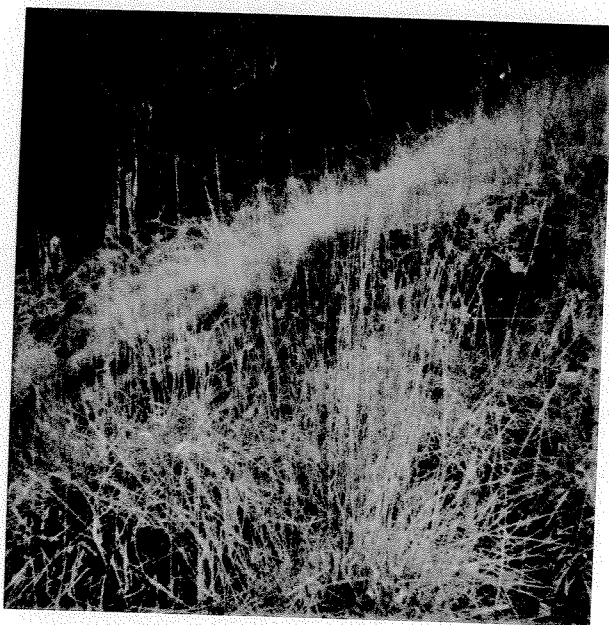


# 28



3/31/88

Looking West

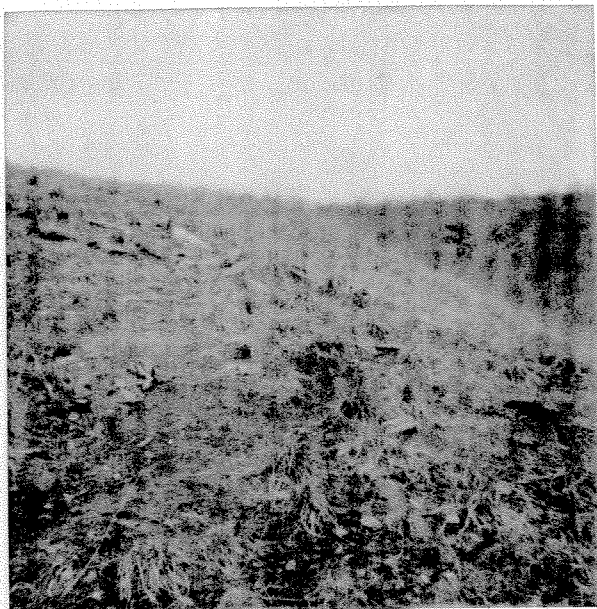


Looking SE

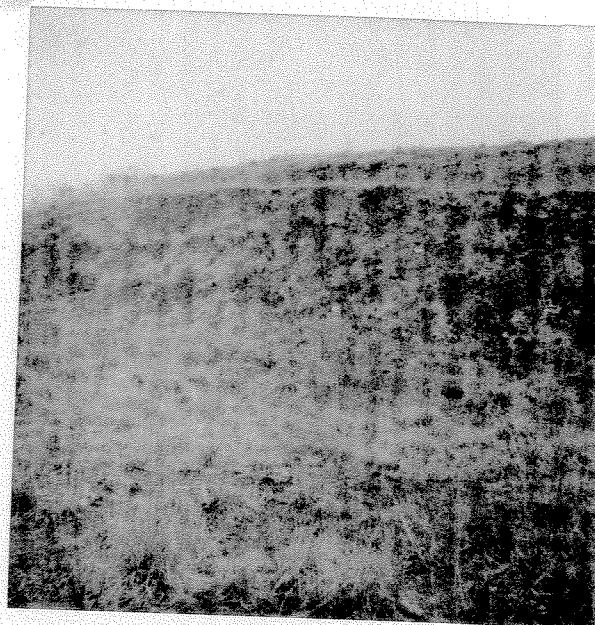


Treated  
Waste  
GRIFFIN PIPE  
mat. HTS  
3/31/88





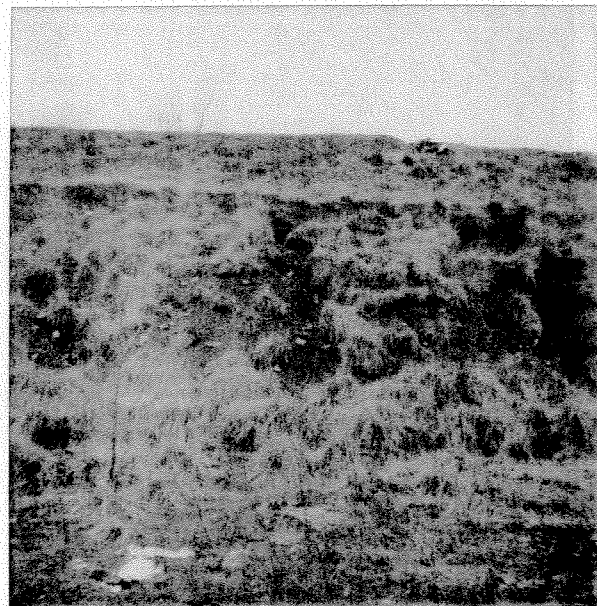
# 90



looking East



# 27  
looking off  
South



look  
SE



# 107



# COMMONWEALTH of VIRGINIA

DEPARTMENT OF WASTE MANAGEMENT  
11th Floor, Monroe Building  
101 N. 14th Street  
Richmond, VA 23219  
(804) 225-2667

Mr. Paul Bauz  
Rehrig International, Inc.  
901 N. Lombardy Street  
Richmond, Virginia 23220

Dear Mr. Bauz:

Enclosed you will find a copy of the report that was issued to the EPA based upon the Department of Waste Management's visit to the Rehrig International, Inc. facility on June 15, 1989.

If you have any questions call me at (804) 225-2906.

Sincerely,

*Kathleen I. Bartholomew*

Kathleen I. Bartholomew  
Environmental Program Analyst

cc: Glenn Moore

**OCTOBER 19, 1990**

**LETTER FROM REHRIG INTERNATIONAL TO VIRGINIA DEPARTMENT OF  
WASTE MANAGEMENT**



October 19, 1990

Commonwealth of Virginia  
Department of Waste Management  
11th Floor Monroe Building  
101 N. 14th Street  
Richmond, Virginia 23219

Attn: Ms. Cynthia Bailey  
Executive Director

Re: Closure Plan  
VAD089028377

Dear Ms. Bailey:

Enclosed for your use are Certification Statements and support documentation indicating clean closure of our containment slab has been achieved. The decontamination, removal, and sampling activities were supervised by Hatcher-Sayre, Inc.

If you have any questions regarding the enclosed documentation, please feel free to contact me.

Sincerely

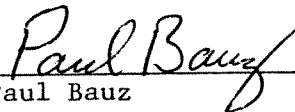
REHRIG INTERNATIONAL

*Paul Bauz*  
Paul Bauz  
Plating and Waste Manager

cc: Mr. Glenn Moore, Chemist

VAD090289377 - Closure Plan

I hereby certify based upon the information provided by Hatcher-Sayres, Inc. that the containment pad for Rehrig International has been closed in accordance with the specifications contained in the approved closure plan.

  
\_\_\_\_\_  
Paul Bauz  
Plating and Waste Manager



VAD089028377 - Closure Plan

I hereby certify that the containment pad for Rehrig International has been closed in accordance with the specifications contained in the approved closure plan. The decontamination, removal and sampling activities were supervised by Hatcher-Sayre, Inc.



William C. Kreye, Ph.D., P.E.  
Vice President, Engineering  
P.E. Registration No. 7434

APPENDIX IV - COCHRAN'S APPROXIMATION TO THE BEHRENS-FISHER STUDENT'S T-TEST<sup>(1)</sup>

$$\bar{X} = \frac{X_1 + X_2 + \dots + X_n}{n}$$

$$S^2 = \frac{(X_1 - \bar{X})^2 + (X_2 - \bar{X})^2 + \dots + (X_n - \bar{X})^2}{n-1}$$

$$t\text{-statistic } t^* = \frac{\bar{X}_m - \bar{X}_b}{\sqrt{\frac{S_m^2}{n_m} + \frac{S_b^2}{n_b}}}$$

$$W_b = \frac{S_b^2}{n_b} \text{ and } W_m = \frac{S_m^2}{n_m}$$

$$\text{Comparison } t\text{-statistic } t_c = \frac{W_b t_b + W_m t_m}{W_b + W_m}$$

If  $t^* \geq t_c$ , conclude there has been a significant increase.

If  $t^* < t_c$ , conclude there has not been a change in the specific parameter.

(1) Reference: 40CFR - Part 264

The Certificate of Analyses presenting analytical test results for rinsate samples (background and monitoring) collected from the containment pad at Rehrig International is provided in Attachment I. Samples numbered 2861, 2862, 2863, and 2864 represent background samples. Samples numbered 2857, 2858, 2859, and 2860 are monitoring samples. All analyses were performed using SW-846 procedures.

1)	<u>TOX:</u>	<u>Background, mg/l</u>	<u>Monitoring, mg/l</u>
		277	192
		291	197
		281	205
		334	209
		$\bar{X}_B = 295.75$	$\bar{X}_M = 200.75$
		$S_B^2 = 684.92$	$S_M^2 = 58.92$
		$t^* = -6.97$	

Since t-statistic is negative, there is no significant difference between the monitoring data and background data.

2) Total Cyanide: None Detected

3) Free Cyanide: None Detected

4)	<u>Arsenic:</u>	<u>Background, mg/l</u>	<u>Monitoring, mg/l</u>
		0.001	0.004
		0.001	0.003
		0.006	0.002
		0.001	0.007
		$\bar{X}_B = 0.00225$	$\bar{X}_M = 0.004$
		$S_B^2 = 6.2 \times 10^{-6}$	$S_M^2 = 4.6 \times 10^{-6}$
		$t^* = 1.065$	
		$W_B = 1.55 \times 10^{-6}$	$W_M = 1.1 \times 10^{-6}$
		$t_c = 2.353$	

Since  $t^* < t_c$ , no significant increase.

5)	<u>Barium:</u>	<u>Background, mg/l</u>	<u>Monitoring, mg/l</u>
		0.34	0.24
		0.42	0.18
		0.23	0.21
		0.36	0.35
		$\bar{X}_B = 0.3375$	$\bar{X}_M = 0.245$
		$S_B^2 = 0.0063$	$S_M^2 = 0.0055$
		$t^* = -1.7$	

Since t-statistic is negative, there is no significant difference between the monitoring data and background data.

6)	<u>Cadmium:</u>	<u>Background, mg/l</u>	<u>Monitoring, mg/l</u>
		0.0002	0.0002
		0.0002	0.0004
		0.0007	0.0005
		0.0002	0.0005
		$\bar{X}_B = 3.25 \times 10^{-4}$	$\bar{X}_m = 4.0 \times 10^{-4}$
		$S_B^2 = 6.25 \times 10^{-8}$	$S_m^2 = 2.0 \times 10^{-8}$
		$t^* = 0.522$	
		$W_B = 1.5625 \times 10^{-8}$	$W_m = 5.0 \times 10^{-9}$
		$t_c = 2.353$	

Since  $t^* < t_c$ , no significant increase.

7) Hexavalent Chromium: None Detected

8) Trivalent Chromium: None Detected

9)	<u>Lead:</u>	<u>Background, mg/l</u>	<u>Monitoring, mg/l</u>
		0.003	0.006
		0.002	0.013
		0.015	0.014
		0.005	0.013
		$\bar{X}_B = 6.25 \times 10^{-3}$	$\bar{X}_m = 1.15 \times 10^{-2}$
		$S_B^2 = 3.55 \times 10^{-5}$	$S_m^2 = 1.36 \times 10^{-5}$
		$t^* = 1.498$	
		$W_B = 8.8 \times 10^{-6}$	$W_m = 3.4 \times 10^{-5}$
		$t_c = 2.353$	

Since  $t^* < t_c$ , no significant increase.

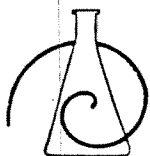
10) Selenium: None Detected

11) Silver: None Detected

12) <u>Nickel:</u>	<u>Background, mg/l</u>	<u>Monitoring, mg/l</u>
	0.006	0.006
	0.006	0.018
	0.014	0.009
	0.002	0.010
	$\bar{X}_B = 0.007$	$\bar{X}_m = 0.01075$
	$S^2_B = 2.53 \times 10^{-5}$	$S^2_m = 2.62 \times 10^{-5}$
	$t^* = 1.045$	
	$W_B = 6.3 \times 10^{-6}$	$W_m = 6.5 \times 10^{-6}$
	$t_c = 2.352$	

Since  $t^* < t_c$ , no significant increase.

**ATTACHMENT 1**  
**CERTIFICATE OF ANALYSIS**



FOUNDED 1959

# COMMONWEALTH LABORATORY SEP 13 1990

INCORPORATED

CHEMISTS BUILDING, 2209 EAST BROAD STREET

RICHMOND, VIRGINIA 23223

P.O. BOX 8025

AREA CODE 804

TELEPHONE: 648-8358

FAX 644-5820

## CERTIFICATE OF ANALYSIS FOR:

Mr. Terry Blankenship  
Hatcher-Sayre, Inc.  
905 Southlake Boulevard  
Richmond, Virginia 23236

DATE: September 12, 1990  
SAMPLE NUMBER: 90-50-4132  
SAMPLE RECEIVED: August 30, 1990  
Nine (9) samples  
IDENTIFIED AS: Rehrig Pad Closure  
North Lombardy Street  
Project Number 178-002

METHOD OF ANALYSIS: EPA

### ANALYTICAL RESULTS:

UNIT OF MEASUREMENT: mg/l,  
unless otherwise noted

Analyzed For:	2857	2858	2859	2860	2861
TOX, ug/l	192	197	205	209	277
Total Cyanide, LOD = 0.02	ND	ND	ND	ND	ND
Free Cyanide, LOD = 0.02	ND	ND	ND	ND	ND
Arsenic, LOD = 0.001	0.004	0.003	0.002	0.007	ND
Barium	0.24	0.18	0.21	0.35	0.34
Cadmium, Furnace LOD = 0.0002	ND	0.0004	0.0005	0.0005	ND
Hexavalent Chromium, LOD = .01	ND	ND	ND	ND	ND
Trivalent Chromium, LOD = .01	ND	ND	ND	ND	ND
Lead, Furnace	0.006	0.013	0.014	0.013	0.003
Selenium, LOD = 0.001	ND	ND	ND	ND	ND
Silver, Furnace, LOD = 0.001	ND	ND	ND	ND	ND
Nickel, Furnace	0.006	0.018	0.009	0.010	0.006



COMMONWEALTH LABORATORY  
INCORPORATED

90-50-4132  
Page 2

	2862	2863	2864
TOX, ug/l	291	281	334
Total Cyanide, LOD = 0.02	ND	ND	ND
Free Cyanide, LOD = 0.02	ND	ND	ND
Arsenic, LOD = 0.001	ND	0.006	ND
Barium	0.42	0.23	0.36
Cadmium, Furnace, LOD = 0.0002	ND	0.0007	ND
Hexavalent Chromium, LOD = .01	ND	ND	ND
Trivalent Chromium, LOD = .01	ND	ND	ND
Lead, Furnace	0.002	0.015	0.005
Selenium, LOD = 0.001	ND	ND	ND
Silver, Furnace, LOD = 0.0002	ND	ND	ND
Nickel, Furnace	0.006	0.014	0.002

Respectfully submitted,

*Edwin Cox III*  
for  
Edwin Cox III  
President

ECIII:cpk

Analytical Methods  
EPA SW-846

TOX	9020
CN	9010
Arsenic	9060
Barium	7080
Cadmium	7131
Chromium VI	7195
Lead	7421
Selenium	7740
Silver	7761
Nickel	7521

**NOVEMBER 6, 1990**

**LETTER FROM VIRGINIA DEPARTMENT OF WASTE MANAGEMENT TO  
REHRIG INTERNATIONAL**



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF WASTE MANAGEMENT

11th Floor, Monroe Building

101 N. 14th Street

Richmond, VA 23219

(804) 225-2667

TDD (804) 371-8737

NOV 06 1990

Paul Bauz, Plating and Waste Manager  
Rehrig International  
901 North Lombardy Street  
Richmond, Virginia 23220

Re: EPA ID # VAD089028377, Closure of the Rehrig International Facility

Dear Mr. Bauz:

On November 1, 1990, the facility was visited by Glenn More, Chemist, representative from the Department of Waste Management. The inspection and the required certifications show that hazardous waste closure has been performed in accordance with the approved closure plan. Therefore, in accordance with Section 9.7.C.8 of the Virginia Hazardous Waste Management Regulations, you are hereby notified that financial assurance for closure of the facility is no longer required. Please note, however, that the Environmental Protection Agency retains the authority to address possible corrective action of continuing releases pursuant to the Hazardous and Solid Waste Amendments of 1984.

If there are any questions, please feel free to call me at (804) 225-3754.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Glenn Moore".

Glenn Moore, Chemist  
Division of Technical Services

Handwritten initials "JS" and the date "10/28" in a cursive script.

**NOVEMBER 9, 1990**

**RCRA INSPECTION**

Tom McCARLEY

GEN



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF WASTE MANAGEMENT

11th Floor, Monroe Building

101 N. 14th Street

Richmond, VA 23219

(804) 225-2667

TDD (804) 371-8737

NOV 09 1990

Certified-Return  
Receipt Requested

Paul Bauz, Plating Manager  
Rehrig International  
901 N. Lombardy Street  
Richmond, Virginia 23220

Re: VAD089028377, Compliance Inspection

Dear Mr. Bauz:

Your facility was visited by a representative of the Department on October 15, 1990 in order to conduct a Hazardous Waste Management Compliance Inspection. During the inspection, checklists were completed (copies enclosed) to document compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). It was noted that your facility appeared to be in compliance with the VHWMR.

If there are any questions, please feel free to call me at (804) 225-3754.

Very truly yours,

A handwritten signature in cursive script that reads "Glenn Moore".

Glenn Moore, Chemist  
Division of Technical Services

Enclosures

APRIL 1990

SURVEY SHEET  
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

Name of Facility: REHRIG INTERNATIONAL  
Address: 901 N. LOMBARDY STREET  
RICHMOND, VA. 23220  
EPA ID Number: VAD089028377  
Facility Representative: Paul BAUZ  
Title: PLATING MANAGER  
Telephone Number: (804) 355-7864  
Inspector's Name: GLENN MOORE  
Title: CHEMIST  
Date of Inspection: 11/1/90

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.)  
MANUFACTURING SHOPPING CARTS

2. Give a brief description of the waste stream(s) and hazardous waste code(s) generated by the firm.  
F-006 NICKEL-CHROME PLATING SLUDGE

3. List the amounts of hazardous waste generated on a monthly basis (use the highest monthly total) and the greatest amount accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
<u>F006</u>	<u>4,800 #/mo</u>	<u>10,200 # (11 Drums)</u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>

4. Does the facility ever generate greater than:  
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)? YES ☒ NO

100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste? YES ☒ NO

If yes, then the facility is a generator.

5. How is the waste presently being handled? Where is it sent?  
ENVIRONMENTAL SERVICES of OHIO CHEM-MET SERVICES  
WYANDOTTE, MI. 48192

OHIO 045 247905

MI 096963194

6. Does the facility generate any hazardous waste that is excluded from regulation? If yes, list the waste and the basis for exclusion. YES ☒ NO

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Does the facility generate any hazardous waste that is burned for energy recovery (hazardous waste fuel)? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist. YES ☒ NO

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. Does the facility generate any used oil that is burned for energy recovery (used oil fuel), including used oil that is also a characteristic hazardous waste, or used oil that is mixed with hazardous waste generated by a conditionally exempt Small Quantity Generator? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist. YES ☒ NO

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



9. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist. YES (NO)

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10. Does the facility generate, transport or collect spent lead-acid batteries? If yes, complete the Recyclable Materials Checklist. YES (NO)

11. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. small quantity generator
- c. generator
- (d) permitted or interim status TSD
- e. unpermitted TSD (explain in comments section)

[Circle One]

12. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate indefinitely, but if the amount accumulated ever exceeds 1000 kgs. then he becomes a small quantity generator. At the time the 1000 kg. limit is passed, the accumulation times for small quantity generators begins.

Small quantity generators can accumulate up to 180 days or 270 days if the disposal site is over 200 miles away. However, if at any time over 6000 kgs. of waste is accumulated, then the small quantity generator becomes a generator.

13. List each container and tank accumulation area. Specify the number and capacity of each tank. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that site.]

Location	Number of Containers	Number of Tanks	Capacity
#1	1 - 55gal. Drum	-	55gals
#2	17 - 55gal Drum	-	55gals

14. Comments

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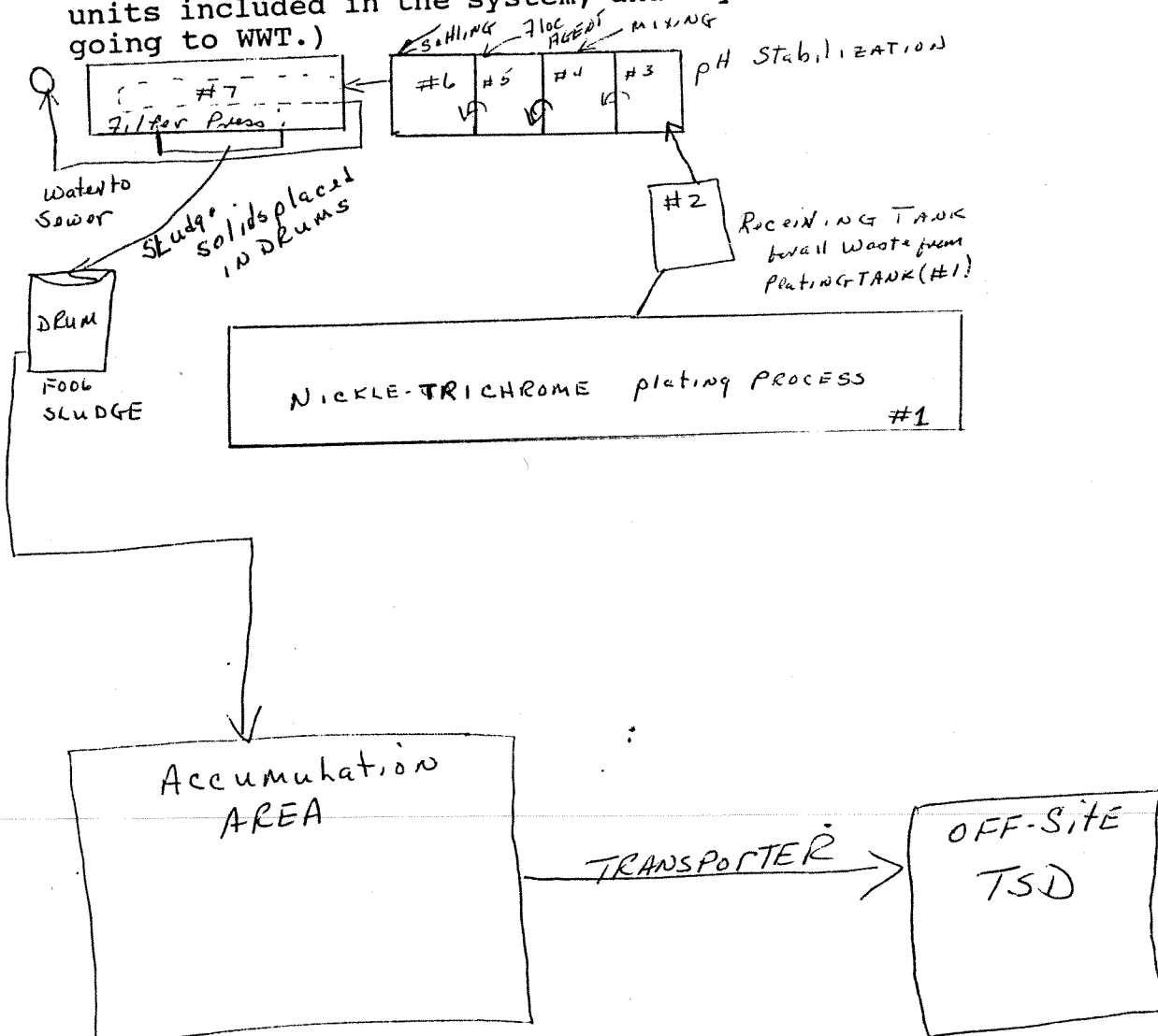
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# 15. Waste Management Flow Diagram

(On this page sketch a brief, but detailed, flow diagram that includes where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)



APRIL 1990

INSPECTION CHECKLIST FOR  
THE USE AND MANAGEMENT OF CONTAINERS

Name of Facility: PEARIG INTERNATIONAL  
Address: 901 N. LOMBARDY STREET  
RICHMOND, VA. 23220  
EPA ID Number: VAD 089028377  
Facility Inspection Representative: Paul Bauz  
Title: PLATING MANAGER  
Telephone Number: (804) 355-7864  
Inspector's Name: GLENN MOORE  
Title: CHEMIST  
Date of Inspection: 11/1/90

Va. Hazardous  
Waste Reg.

9.8.B.

1. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?

☒ YES ☐ NO

If no, list the storage/accumulation areas where there are problems and the type of problem:

<u>Location</u>	<u>Problem</u>
_____	_____
_____	_____
_____	_____

9.8.C.

2. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?

☒ YES ☐ NO

6.4.E.b

3. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container?

☒ YES ☐ NO

6.4.E.c.

4. Is the container labeled or marked clearly with the words "Hazardous Waste"?

☒ YES ☐ NO

9.8.D.1.

5. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste?

☒ YES ☐ NO

If no, list the locations where open containers are found. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

9.8.E.

6. Are areas where hazardous waste containers are stored inspected by the owner/operator at least weekly?

☒ YES ☐ NO

9.1.F.2.a.

9.1.F.4.

6.4.E.1.d.

7. For large quantity generators and TSD facilities only:

Is an inspection log maintained?

☒ YES ☐ NO

9.8.F.

8. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?

☒ YES ☐ NO

9.8.G.1.

9. Are incompatible wastes placed in separate containers?

YES NO

NA

9.8.G.3.

10. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices?

YES NO

NA

6.4.E.3.a.

11. For satellite accumulation areas:

a. Are there more than 55 gallons of any one type of waste present in the area?

YES NO

If yes,

6.4.E.3.b

b. Has the amount in excess of 55 gallons been in the satellite accumulation area longer than 3 days?

YES NO  
NA

If yes,

6.4.E.3.b.  
6.4.E.1.b.

c. Has the company notified the Department about the location of the accumulation area?

YES NO  
NA

10. Comments:

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APRIL 1990

CHECKLIST FOR HAZARDOUS WASTE  
INSPECTION OF GENERATORS

Name of Facility: REARIG INTERNATIONAL  
Address: 901 W. LOMBARDY STREET  
RICHMOND, VA. 23220  
EPA ID Number: VAD 089028377  
Facility Representative: Paul Bayz  
Title: PLATING MANAGER  
Telephone Number (804) 355-7864  
Inspector's Name: GLENN MOORE  
Title: CHEMIST  
Date of Inspection: 11/1/90

Va. Hazardous Generator Checklist  
Waste Reg.

- 6.3. 1. Is a manifest system currently being used for all hazardous waste shipped off site? ☒ YES ☐ NO
- 6.2.C. 2. Has the generator determined that the transporter(s) and facility have an EPA ID number? [Note: Shipments to POTWs must be manifested and the POTW must meet all permit-by-rule requirements of VHWMR Section 11.8.B.] ☒ YES ☐ NO
- 5.5.A.7 3. Has the generator determined that the transporter has a valid EPA Identification number and a valid Virginia Transporter Permit? ☒ YES ☐ NO
- 6.3 4. Is the following information on the  
5.3.B.1. manifest:

- a. The generator's name, mailing address, EPA ID Number, and telephone number? ☒ YES ☐ NO
- 5.3.B.2. b. A unique five digit number assigned to this manifest by the generator? ☒ YES ☐ NO
- 5.3.B.3. c. The total number of pages of the manifest? ☒ YES ☐ NO
- 5.3.B.4. d. The company name and EPA ID number of each transporter used? ☒ YES ☐ NO
- 5.3.B.5. e. The company name, site address, and EPA ID number of the facility designated to receive the waste? ☒ YES ☐ NO
- 5.3.B.6. f. The U. S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material? ☒ YES ☐ NO
- 5.3.B.7. g. The quantities of waste being shipped? ☒ YES ☐ NO
- 5.3.C. h. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment."



6.5.C.2.

5. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago?

☒ YES ☐ NO

If no, has the generator filed an exception report with the Executive Director which included:

YES NO

NA

6.5.C.2.a.

a. A legible copy of the manifest for which the generator does not have confirmation of the delivery; and

YES NO

NA

6.5.C.2.b.

b. A cover letter explaining the efforts taken to locate the shipment?

YES NO

NA

6.4.E.1.

6. Is hazardous waste being accumulated on-site for less than 90 days? If yes,

☒ YES ☐ NO

6.4.E.1.a.

a. Is the waste stored in containers? In tanks?

☒ YES ☐ NO  
☒ YES ☒ NO

(If answer to either question is yes, fill out appropriate checklists. If both answers are no, interim status or a TSD permit is required - fill out facility checklist to determine compliance status).

6.4.E.1.b.

b. Is the date that accumulation begins clearly marked and visible for inspection on each container?

☒ YES ☐ NO

6.4.E.1.c.

c. Is each container and tank clearly marked with the words "Hazardous Waste"?

☒ YES ☐ NO

6.4.E.1.e.

d. Has the generator notified the Executive Director by March 1, 1988, of the exact location of the existing accumulation areas, and at least 15 days prior to use for subsequently established accumulation areas?

☒ YES ☐ NO

6.4.E.2.

7. Does the generator accumulate (store) hazardous waste on-site for greater than 90 days? If yes, interim status or a TSD permit is required - fill out facility checklist to determine compliance status.

YES ☒ NO

6.4.E.1.d.

8. Does the generator record inspections

☒ YES ☐ NO

9.1.F.4.

in an inspection log?

6.4.E.1.d.

9.1.G.1.

9. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?

☒ YES ☐ NO

9.1.G.2.

10. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility?

☒ YES ☐ NO

9.1.G.3.

11. Do personnel participate in an annual review of the initial training?

☒ YES ☐ NO

12. Does the facility maintain a record of the following:

9.1.G.4.a.

a. job titles for each position at the facility related to hazardous waste management; and

☒ YES ☐ NO

9.1.G.4.a.

b. the name of the employee filling each job; and

☒ YES ☐ NO

9.1.G.4.b

c. a written job description for each position in (a); and

☒ YES ☐ NO

9.1.G.4.c.

d. a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in (a); and

☒ YES ☐ NO

9.1.G.4.d.

e. Records that document that the training or job experience required above has been given to, and completed by facility personnel?

☒ YES ☐ NO

9.2.B.

9.2.D.

13. At the facility, is the following equipment installed:

9.2.B.1.

a. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste generation or accumulation areas are threatened by hazardous waste release, fire or explosion?

☒ YES ☐ NO

9.2.B.2.

b. A device (at the scene of hazardous waste generator operations) capable of summoning emergency assistance from Police, Fire Departments, etc.?

☒ YES ☐ NO

9.2.B.3.

c. Portable fire extinguishers, fire control, and decontamination equipment?; and

☒ YES ☐ NO

9.2.B.4.

d. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system?

☒ YES ☐ NO

9.2.C.

14. Is a record of tests and inspections of items 13 a-d maintained at the facility?

☒ YES ☐ NO

9.2.E.

15. Does the facility have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies?

☒ YES ☐ NO

6.4.E.1.d.  
9.3.

16. Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water?

☒ YES ☐ NO

9.3.B.

17. Does the contingency plan contain the following elements:

9.3.B.(1,2).

a. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water? ☒ YES ☐ NO

9.3.B.3.

b. A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams to coordinate emergency services, as required? ☒ YES ☐ NO

9.3.B.4.

c. A listing of names, addresses, and office and home phone numbers of all persons qualified to act as emergency coordinator? List primary Coordinator. ☒ YES ☐ NO

Name Paul BAUZE

Title Planting MANAGER

Telephone (H) 262-2268 (D) 355-7864

9.3.B.5.

d. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? ☒ YES ☐ NO

9.3.B.6.

e. Does this list specify the location and physical description of each item on the list and a brief outline of its capabilities? ☒ YES ☐ NO

9.3.B.6.

f. An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? ☒ YES ☐ NO

9.3.C.

g. Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? ☒ YES ☐ NO

List:

RICHMOND POLICE, FIRE & Reg. Sq.

STUART CIRCLE HOSPITAL

9.3.C.

h. Is there documentation to indicate the personnel listed above received the contingency plan? ☒ YES ☐ NO

9.3.F.(9,10).

i. Has the contingency plan ever been implemented? YES ☒ NO

If yes, was a written report filed with the Executive Director and were the Executive Director and other required authorities properly notified before operations resumed? YES ☒ NO *NA*

6.4.E.3.a.

18. Does the generator have satellite accumulation areas? If yes, ☒ YES ☐ NO

a. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate? ☒ YES ☐ NO

6.4.E.3.a.(1)  
9.8.B.

b. Are the containers in good condition? ☒ YES ☐ NO

6.4.E.3.a.(1)  
9.8.C.

c. Are the containers compatible with the waste? ☒ YES ☐ NO

6.4.E.3.a.(1)  
9.8.D.1.

d. Are the containers kept closed except as necessary to add or remove waste? ☒ YES ☐ NO

6.4.E.3.a.(2)

e. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container? ☒ YES ☐ NO

6.5.E.3.b.

f. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes, YES ☒ NO

(1) Has the generator marked the excess amount with the date the excess amount began accumulating? YES ☐ NO *NA*

(2) Has the generator either removed the excess amount within three days of the date of excess accumulations or has he complied with all other provisions for accumulation areas listed in question 5 on this checklist? YES ☐ NO *NA*  
Namely, has he notified the

Executive Director about the location of the accumulation area?

If no, what has the generator chosen to do? \_\_\_\_\_

6.5.A.

19. Does the generator retain copies of all manifests, annual reports, and test results for at least three years?

☒ YES ☐ NO

6.5.B.

20. Has the facility submitted an annual report for the preceding calendar year?

☒ YES ☐ NO

21. Comments: The facility is closing  
the INTERIM STATUS STORAGE UNIT. AFTER  
CLOSURE IS COMPLETED, the facility will  
BECOME a LARGE QUANTITY GENERATOR.

APRIL 1990

CHECKLIST FOR THE INSPECTION  
OF INTERIM STATUS HAZARDOUS WASTE FACILITIES

Name of Facility: REHRIG INTERNATIONAL  
Address: 901 D. LOMBARDY STREET  
RICHMOND, VA 23220  
EPA ID Number: VAD089028377  
Facility Representative: PAUL BAUZ  
Title: PLATING MANAGER  
Telephone Number: (804) 355-7864  
Inspector's Name: GLENN MOORE  
Title: CHEMIST  
Date of Inspection: 11/1/90

Va. Hazardous  
Waste Regulation

1. Does this facility: (Circle One)

Store Treat Dispose

Hazardous Waste?

9.1.D.

2. Does the facility have a waste  
analysis plan?

YES NO

If yes, does it contain:

9.1.D.5.a.

a. The parameters for which each  
hazardous waste will be analyzed?

YES NO

9.1.D.5.b.

b. The test methods for each  
parameter?

YES NO

9.1.D.5.c.

c. The sampling method to obtain a  
representative sample?

YES NO

9.1.D.5.d.

d. The frequency to review the  
analysis?

YES NO

9.1.D.6.	(For facilities receiving waste from off-site only):	
9.1.D.6.	e. The procedures used to inspect, and if necessary, analyze each shipment of hazardous waste received at the facility?	YES NO NA
9.1.E.	3. Does the facility have either	
9.1.E.2.a.	a. a 24-hour surveillance system?	(YES) NO
	OR	
9.1.E.2.b.	b. A natural or artificial barrier which completely surrounds the active portion of the facility?	(YES) NO
	AND	
9.1.E.2.c.	c. A means to control entry at all times to the active portion of the facility?	(YES) NO
9.1.E.3.	4. Is a sign posted at each entrance and at locations in sufficient numbers to be seen from all approaches to the active portion of the facility stating "Danger - Unauthorized Personnel Keep Out"?	(YES) NO
9.1.F.2.	5. Does the facility have a written inspection schedule for all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment?	(YES) NO
	If <u>yes</u> , does the inspection schedule include:	
9.1.F.2.c.	a. The types of problems to look for during the inspection?	(YES) NO
9.1.F.2.d.	b. The frequency of inspection?	(YES) NO
9.1.F.4.	6. Does the owner/operator maintain an inspection log or summary of all inspections?	(YES) NO



9.1.G.1.a.

7. Have facility personnel successfully completed a program of on-the-job and classroom instruction in proper hazardous waste management?

☒ YES ☐ NO

9.1.G.2.

8. Are new personnel trained within six months after assignment to the facility?

☒ YES ☐ NO

9.1.G.3.

9. Are facility personnel given annual reviews of the initial training?

☒ YES ☐ NO

9.1.G.4.

10. Are the following documents and records maintained at the facility?

☒ YES ☐ NO

9.1.G.4.a.

a. Job titles for each position related to hazardous waste management?

☒ YES ☐ NO

9.1.G.4.b.

b. The name of the employee filling each job?

☒ YES ☐ NO

9.1.G.4.c.

c. A written job description for each position?

☒ YES ☐ NO

d. Records to document the amount of introductory and continuing training given each facility personnel?

9.2.H.

11. Are all ignitable or reactive wastes stored at the facility separated and protected from sources of ignition or reaction including: open flames; smoking; cutting and welding; hot flames; hot surfaces; frictional heat sparks; spontaneous ignition; and radiant heat?

☒ YES ☐ NO

9.2.B.

12. Is the facility equipped with the following:

9.2.B.1.

a. An internal communications or alarm system capable of providing immediate emergency instruction to facility personnel?

☒ YES ☐ NO

9.2.B.2.

b. A device (telephone, 2 way radio) capable of summoning emergency assistance?

☒ YES ☐ NO

9.2.B.3.

c. Portable fire extinguishers, fire control equipment, and decontamination equipment?

☒ YES ☐ NO

9.2.B.4.

d. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers, or water spray systems?

☒ YES ☐ NO

9.2.E.

13. Is adequate aisle space maintained to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area during an emergency?

☒ YES ☐ NO

9.3.

14. Does the facility have a contingency plan that includes the following?

9.3.B.1.

a. Actions that facility personnel will take in response to fires, explosions, or unplanned releases of hazardous waste?

☒ YES ☐ NO

9.3.B.3.

b. The arrangements agreed to by local police and fire departments, hospitals, contractors, and Commonwealth and local emergency response teams?

☒ YES ☐ NO

9.3.B.4.

c. The name, addresses, and office and home phone of all emergency coordinators?

☒ YES ☐ NO

List the primary coordinator:

Name Paul BAUZ  
Office Telephone 355-7864  
Home Telephone 262-2268

9.3.B.5.

d. A list of all emergency equipment, the location and physical description of the item, and a brief outline of its capabilities?

☒ YES ☐ NO

9.3.B.6.

e. An evacuation plan if necessary?

☒ YES ☐ NO

9.3.C.2.

15. Has a copy of the plan been sent to all local police and fire departments, hospitals, and Commonwealth and local emergency response teams that may be called to provide emergency services?  
List them RICHMOND POLICE  
FIRE  
RES. SQ  
STUART CIRCLE Hospital

☒ YES ☐ NO

Is there documentation that the above agencies have received the contingency plan?

☒ YES ☐ NO

9.3.D.

16. Has the plan been implemented?

YES ☒ NO

If yes,

9.3.F.9.

a. Did the owner notify the Executive Director prior to resuming operations?

YES ☒ NO

9.3.F.10.

b. Did the owner file a written report within 15 days with the Executive Director?

YES ☒ NO

9.4.B.1.

17. Does the facility have a written operating record? : Does the record include:

☒ YES ☐ NO

9.4.B.2.a.

a. A description of the quantity of hazardous waste received and/or generated, and the method(s) and date(s) of its treatment, storage, or disposal?

☒ YES ☐ NO

9.4.B.2.b.

b. The location of each hazardous waste within the facility?

☒ YES ☐ NO

9.4.B.2.c.

c. The results of waste analysis and incineration trial tests?

☒ YES ☐ NO

9.4.D.

16. Has the facility submitted an annual report for the previous calendar year?

☒ YES ☐ NO

9.4.E.	17. Has the facility accepted any unmanifested waste shipments?	YES NO NA
11.2.A 11.2.D.2	18. Has the facility submitted a Part B Application? Date submitted: _____	YES NO NA
11.3.B.1	19. Has the owner/operator treated, stored or disposed of hazardous waste not specified in Part A of the Permit Application?	YES (NO)
11.3.B.2	20. Does the facility employ processes not specified in Part A of the Permit Application?	YES (NO)
11.3.B.3	21. Does the facility exceed the design capacities specified in Part A of the Permit Application?	YES (NO)
11.3.C.1	22. If answer to questions 19, 20, or 21 above was <u>yes</u> , has the owner/operator submitted a revised Part A application?	YES (NO)
9.6.C.1	23. Does the owner or operator of the hazardous waste management facility have a written closure plan for the facility?	(YES) NO
	Does the plan include the following:	
9.6.C.2.a	a. A description of how each hazardous waste management unit at the facility will be closed in a manner that minimizes the need for further maintenance, and that controls, minimizes or eliminates post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off or hazardous waste decomposition products?	(YES) NO
9.6.C.2.b	b. A description of how final closure of the facility will be conducted in order to minimize those items listed in (a) above?	(YES) NO

9.6.C.2.c

c. An estimate of the maximum inventory of hazardous wastes ever on-site over the active life of the facility, and a detailed description of the methods to be used during partial and final closure?

☒ YES ☐ NO

9.6.C.2.d

d. A detailed description of the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures, and soils during partial and final closure?

☒ YES ☐ NO

9.6.C.2.e

e. A detailed description of other activities necessary during the partial and final closure period to ensure that all partial closures and final closure satisfy the closure performance standard?

☒ YES ☐ NO

9.6.C.2.f

f. A schedule for closure of each hazardous waste management unit and for final closure of the facility?

☒ YES ☐ NO

9.6.C.2.g

g. An estimate of the expected year of final closure for facilities that use trust funds to demonstrate financial assurance and whose remaining operating life is less than twenty years, and for facilities without approved closure plans?

☒ YES ☐ NO

9.6.3

24. Is the closure plan up-to-date with regard to any changes in operating plans or facility design which might affect the closure, expected year of closure, and any unexpected events which might require a modification of the closure plan?

☒ YES ☐ NO

X See  
COMMENT

FOR OWNER/OPERATORS OF HAZARDOUS WASTE DISPOSAL UNITS, SURFACE IMPOUNDMENTS OR WASTE PILES:

9.6.I.1

25. Has the owner/operator submitted a post-closure plan which includes the following:

9.6.I.3.a

a. A description of the planned monitoring activities and frequencies at which they will be performed during the post-closure care period?

NA  
YES NO

9.6.I.3.b

b. A description of the planned maintenance activities, and frequencies at which they will be performed to ensure the integrity of the cap and final cover or other containment systems, and the function of the monitoring equipment?

NA  
YES NO

9.6.I.3.c

c. The name, address, and phone number of the person or office to contact about the hazardous waste disposal unit or facility during the post-closure care period?

NA  
YES NO

9.7.B.1

26. Does the owner/operator have a detailed written estimate, in current dollars, of the cost of closing the facility? Current closure cost estimate:

(YES) NO

9.7.B.2

27. Has the owner/operator within 60 days prior to the anniversary date of the establishment of the financial instrument adjusted the closure cost estimate to account for inflation?

(YES) NO

9.7.C.

28. Has the owner/operator established financial assurance for closure of the facility? What is the financial mechanism? BOARD

(YES) NO

9.7.D.1

29. Does the owner/operator have a detailed written estimate, in current dollars, of the post-closure cost of the facility? Current post-closure cost estimate: \_\_\_\_\_

YES NO

NA

9.7.D.2

30. Has the owner/operator within 60 days prior to the anniversary date of the establishment of the financial instrument adjusted the closure cost estimate to account for inflation?

YES ☒ NO

9.7.E

31. Has the owner/operator of the facility established financial assurance for the post-closure of the facility? What is the financial mechanism? \_\_\_\_\_

YES NO

N/A

9.7.G.1

32. Has the owner/operator of the hazardous waste treatment, storage, or disposal facility demonstrated financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility or group of facilities?

YES ☒ NO

X  
See Comment

What is the latest submission date? \_\_\_\_\_

List the type of mechanism used and the documentation to support the mechanism:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

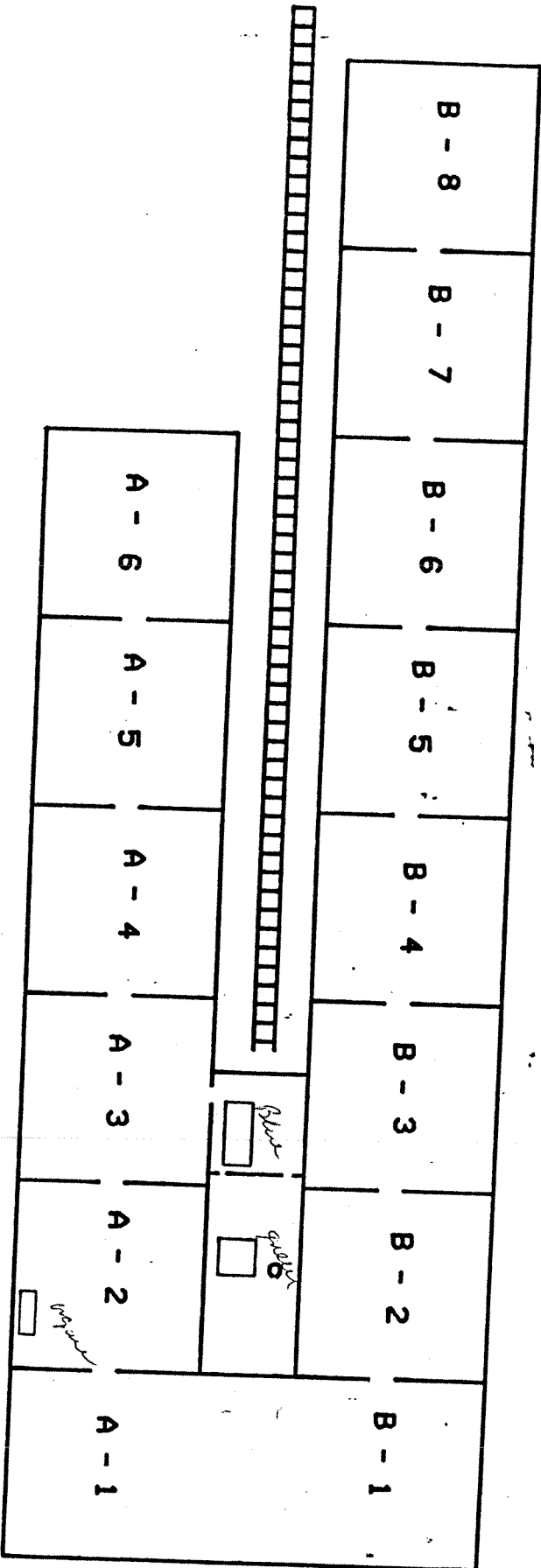
33. Comments: \_\_\_\_\_

Facility is closing. will be  
a GENERATOR AFTER CLOSURE  
is APPROVED.  
\_\_\_\_\_  
\_\_\_\_\_

# REHRIG INTERNATIONAL WASTE DRUM STORAGE AREAS

BLUE : MAIN STORAGE AREA TO BE CLOSED  
GREEN : LESS THAN 90 DAY ACCUMULATION AREA  
ORANGE : SATELLITE ACCUMULATION AREA

Lombardy Street



Leigh Street

Bowe Street



OCTOBER 1989

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF  
LAND-RESTRICTED WASTE MANAGEMENT

Name of Facility: REHRIG INTERNATIONAL  
Address: 901 N. LOMBARDY STREET  
RICHMOND, VA. 23220  
EPA ID Number: VAD 089028377  
Facility Representative: PAUL BAUZ  
Title: PLANT MANAGER  
Telephone Number: (804) 355-7864  
Inspector's Name: GLENN MOORE  
Title: CHEMIST  
Date of Inspection: 11/1/90

1. Does the facility generate, transport, or treat, store or dispose any land-restricted wastes? (See Attachment)

☒ YES

NO

If yes, please list:

FOOL

15.1.A.3.

2. Is land disposal of wastes listed in 1 above occurring?

☒ YES

NO

If yes, then:

15.1.A.3.a.

a. Has the facility been granted an extension to the effective date for land restrictions applicable to its restricted waste? (See effective dates listed in Attachment)

☒ YES

NO

15.1.A.3.b.

b. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition?

YES

NO

NA

15.1.A.3.c:

c. Is the waste generated by small quantity generators of less than 220 pounds (100 kg) of hazardous waste, or 1 kg of acutely hazardous waste, per month?

YES ~~NA~~ NO

15.1.E.

d. Has the owner/operator submitted an application for a case-by-case extension to the effective date of any applicable restriction?

YES ~~NA~~ NO

15.1.F.

e. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?

YES ~~NA~~ NO

15.1.D.1.

3. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments?

YES NO

(If no, go to number 6)

[If yes, complete surface impoundment checklist]

[Note: Evaporation of hazardous constituents as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.]

If yes, does the facility meet the following requirements:

15.1.D.1.b

15.1.G.

15.3.C.

15.4.

15.3.

a. Are the residues of the treatment analyzed as specified in VHWMR Sections 15.1.G. or 15.3.C. to determine if they meet the applicable treatment standards or VHWMR Section 15.4, or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR Section 15.3?

YES ~~NA~~ NO

15.1.D.1.c.

9.10.B.1.

10.10.B.3.

b. Has the owner or operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liners?

YES ~~NA~~ NO

15.1.D.1.c.

10.5.

c. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR Section 10.5.?

YES ~~NA~~ NO

15.1.D.1.d.

4. Has the owner or operator submitted a written certification to the Executive Director that items 4 a-c have been met which states,

YES NO  
NA

"I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted wastes. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

15.1.D.1.d.

5. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes?

(YES) NO

15.1.G.1.

6. Has the owner/operator determined if his waste is a land restricted waste?

(YES) NO

15.1.G.1a.

7. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?

(YES) NO

Did the notification include the following information:

15.1.G.1.b.1a

- EPA Hazardous Waste Number;

(YES) NO

15.1.G.1.b.1b

- The corresponding treatment standards and all applicable prohibitions set forth in VHWMR Section 15.3.C;

(YES) NO

15.1.G.1.b.1c

- The manifest number associated with the shipment of waste;

(YES) NO

15.1.G.1.b.1d

- Waste analysis data, where available?

(YES) NO

15.1.G.1.b.

8. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR Section 15.3.C?

YES NO  
NA

a. Did the notification contain the following information:

15.1.G.1.b.1a	- EPA Hazardous Waste Number;	YES <i>NA</i> NO
15.1.G.1.b.1b	- The corresponding treatment standards and all applicable prohibitions;	YES <i>NA</i> NO
15.1.G.1.b.1c	- The manifest number associated with the shipment of waste; and	YES <i>NA</i> NO
15.1.G.1.b.1d	- Waste analysis data, where available?	YES <i>NA</i> NO
15.1.G.1.b.2.	b. Was the certification signed by an authorized representative, and did it state the following:	YES <i>NA</i> NO
	<p>"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR Section 15.4. and all applicable prohibitions set forth in VHWMR Section 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."</p>	
15.1.G.1.c.	9. For restricted wastes which have received a case-by-case exemption, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded a notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?	YES <i>NA</i> NO
15.1.G.2.	10. <u>For Treatment Facilities ONLY:</u> Has the owner or operator of the treatment facility tested the treatment residues or extract to assure that they shall meet the applicable treatment standards?	YES <i>NA</i> NO
15.1.G.2.	a. Has this testing been done at the frequency stated in the waste analysis plan?	YES <i>NA</i> NO
15.1.G.2.a.	b. For treatment residuals which do not meet the applicable treatment standards, has the facility filed the notification in 8 above as a generator to any subsequent treatment facilities?	YES <i>NA</i> NO
15.1.G.1.a.		

YES NA NO

15.1.G.2.b.

c. For treated wastes meeting the applicable treatment standards, or for wastes not subject to any treatment standards, has a certification been signed and accompanies each shipment stating:

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in VHWMR Sections 15.4 and 15.3.C. without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

OR (for wastes with treatment standards expressed as technologies)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of VHWMR Section 15.4.C. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

11. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## Attachment - Land Restricted Wastes

<u>Waste</u>	<u>Effective Date</u>
F001 - F005	11/08/86
F001 - F005 from Small Quantity Generators	11/08/88
F001 - F005 generated via RCRA corrective actions or CERCLA response actions	11/08/88
Hazardous wastes containing less than 1% total F001 - F005 solvent constituents	11/08/88
F001 - F005 soil and debris resulting from RCRA corrective actions or CERCLA response actions	11/08/90
<hr/>	
Dioxin wastes F020 - F023, F026 - F028	11/08/88
F020 - F023, F026 - F028 soil and debris resulting from RCRA corrective actions or CERCLA response actions	11/08/90

### California Listed Wastes

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing free cyanides at concentrations greater than or equal to 1,000 ppm (mg/l). [Effective 7/8/87]

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing any of the following metals or compounds of these metals at concentrations greater than or equal to those specified below:

Arsenic (as As)	500 mg/l
Cadmium (as Cd)	100 mg/l
Chromium (as Cr VI)	500 mg/l
Lead (as Pb)	500 mg/l
Mercury (as Hg)	20 mg/l
Nickel (as Ni)	134 mg/l
Selenium (as Se)	100 mg/l
Thallium (as Tl)	130 mg/l

Liquid hazardous wastes having a pH less than or equal to 2.0. [Effective 7/8/87]

Liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. [Effective 7/8/87]

Liquid hazardous wastes, primarily water, containing greater than or equal to 1000 mg/l HOCs, but less than or equal to 10,000 mg/l HOCs. [Effective 7/8/87]

California waste contaminated soil and debris resulting from RCRA corrective actions or CERCLA response actions. [Effective 11/8/90]

Liquid hazardous wastes, not primarily water, containing greater than or equal to 1000 mg/l HOCs. [Effective 11/8/88]

Nonliquid (non-RCRA/CERCLA) hazardous wastes containing greater than or equal to 1000 mg/l HOCs. [Effective 11/8/88]

---

First Third Wastes

Effective Date

F006 (nonwastewater)	8/8/88
K001	8/8/88
K004 (nonwastewater)	8/8/88
K008 (nonwastewater)	8/8/88
K015	8/8/88
K016	8/8/88
K018	8/8/88
K019	8/8/88
K020	8/8/88
K021 (nonwastewater)	8/8/88
K022 (nonwastewater)	8/8/88
K024	8/8/88
K025	8/8/88
K030	8/8/88
K036 (nonwastewater)	8/8/88
K037	8/8/88
Nonexplosive K046 (nonwastewater)	8/8/88
K047	8/8/90
K048 - K052	8/8/88
K060 (nonwastewater)	8/8/88
K061 (nonwastewater less than 15% Zn)	8/8/88
K061 (nonwastewater greater than 15% Zn)	8/8/88 - 8/8/90
K062	8/8/88
Non-CaSO4 K069 (nonwastewater)	8/8/90
K071	8/8/88
K083 (nonwastewater)	8/8/88
K086 (solvent washes)	8/8/88
K087	8/8/88
K099	8/8/88
K100	8/8/88
K101	8/8/88
K102	8/8/88
K103	8/8/88
K104	8/8/88
Soil and debris contaminated with first third wastes that have treatment standards based on incineration	8/8/90

"Soft Hammer" First Third Wastes

[Effective Date 5/8/90 or as treatment standards are established]

F007	P001	U007	U151
F008	P004	U009	U154
F009	P005	U010	U155
F019	P010	U012	U157
K004	P011	U016	U158
K008	P012	U018	U159
K011	P015	U019	U171
K013	P016	U022	U177
K014	P018	U029	U180
K017	P020	U031	U185
K021	P030	U036	U188
K022	P036	U037	U192
K031	P037	U041	U200
K035	P039	U043	U209
K036	P041	U044	U210
K046	P048	U046	U211
K060	P050	U050	U219
K061	P058	U051	U220
K069	P059	U053	U221
K073	P063	U061	U223
K083	P068	U063	U226
K084	P069	U064	U227
K085	P070	U066	U228
K086	P071	U067	U237
K101	P081	U074	U238
K102	P082	U077	U248
K106	P084	U078	U249
	P087	U086	
	P089	U089	
	P092	U103	
	P094	U105	
	P097	U108	
	P102	U115	
	P105	U122	
	P108	U124	
	P110	U129	
	P115	U130	
	P120	U133	
	P122	U134	
	P123	U137	



**APRIL 1993**

**REPORT FROM SCHNABEL ENVIRONMENTAL SERVICES**

41650

Rev 10/91

# REHRIG ESA UPDATE

APRIL 1993

933083

**Schnabel  
Environmental  
Services**

A Division of Schnabel Engineering Associates, Inc.

933083, Environmental Site  
Assessment Update, Rehrig Facility,  
901 North Lombardy Street, Richmond,  
Virginia

# Schnabel Environmental Services

A Division of Schnabel Engineering Associates, Inc.

JAMES J. SCHNABEL, P.E.  
RAY E. MARTIN, Ph.D., P.E.  
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CARL P. BENSON, C.P.G., P.E.

April 26, 1993

Rehrig International  
901 N. Lombardy Street  
Richmond, Virginia 23220

Attn: J. Randolph Daniel

Subject: 933083, Environmental Site  
Assessment Update, Rehrig Facility,  
901 North Lombardy Street, Richmond,  
Virginia

Gentlemen:

We are pleased to submit our report for the above referenced project. This study was performed according to our proposal dated January 29, 1993. The report was prepared in accordance with generally accepted environmental practice and we make no warranties, either express or implied, as to the professional advice provided under the terms of our agreement and included in this report.

We appreciate the opportunity to be of service for this project. If you have any questions concerning this report, please do not hesitate to contact either of the undersigned.

Very truly yours,

SCHNABEL ENVIRONMENTAL SERVICES

Russell S. Harris, Jr.  
Senior Staff Engineer

Brian Milner, C.P.G.  
Associate

RSH:BM:mrm

April 26, 1993

Rehrig International  
901 N. Lombardy Street  
Richmond, Virginia 23220

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Russell S. Harris, Jr.  
Senior Staff Engineer

Brian Milner, C.P.G.  
Associate

RSH:BM:mrm

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- Figure 4: Hand Auger Location Plan
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## 1.0 EXECUTIVE SUMMARY

Studies were performed at the Rehrig International Facility to update a previous Environmental Site Assessment (ESA) by Radian Corporation, and the Phase II soil sampling and chemical testing by Hatcher-Sayre, Inc. The studies included a site walk-through, soil sampling and chemical testing, review of Rehrig waste disposal practices and potential impacts of on-site incidents since the previous ESA.

From reasonably available Federal, State and local records there are no hazardous waste transport, storage or treatment facilities, environmental incidents or underground storage tanks (UST) registered either on the site or adjacent to it. The site has not been included on the National Priority List (NPL) but is listed on the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) with a "No Further Action Status" by the Environmental Protection Agency (EPA). No active or inactive landfills, or facilities with Virginia Pollution Discharge Elimination System (VPDES) permits are documented at the site or adjacent properties. In addition, there are no NPL, CERCLIS or landfill sites, or VPDES discharges documented within one mile of the assessment site on the available records.

Two incidents have occurred at the site since the last environmental review. The first incident was the discovery and subsequent removal of soil contaminated by hydraulic oil. The contamination is thought to have occurred prior to Rehrig's occupancy of the site. The second incident was a chemical reaction caused by sodium hydrosulfite that was isolated to a 55 gallon drum trash container. Both incidents were closed to the satisfaction of the State Water Control Board (SWCB) and the Richmond Fire Department. In addition, a UST was removed from the site in 1988. Soil samples collected during this study from borings in the vicinity of the tank excavation showed low levels of petroleum hydrocarbon contamination (see Table 1). The levels were below the reportable level of 100 mg/kg set by the SWCB.

We performed a plant walk-through to observe the aspects of Rehrig's manufacturing operations, in particular the plating operations and waste disposal practices at the facility. Waste water from the plating operation is discharged to the city sewer system after treatment. The solid waste from the treatment system is removed from the site by a registered hazardous waste handler. Metal shavings are sent to Peck Metals for recycling. Waste oil and parts cleaner from all parts of the operation are collected by recycling firms. Hazardous materials and hazardous waste (prior to collection) are stored in areas designed to meet regulatory requirements. A new plating machine is presently being installed. Both plating areas have dikes for containment of spills. The other manufacturing operations, including the metal fabrication, injection molding, and assembly operations do not involve hazardous materials or hazardous waste and pose a low risk of environmental impairment.

The results of the chemical analyses on the soil samples collected from the plating area and the UST location are similar to

those obtained by Hatcher-Sayre. These results indicate that since the last environmental review, environmental conditions at the site are likely unchanged. The analyses of the soil samples collected from the plating area show that the levels of chromium and nickel would not be considered hazardous because they are below the Environmental Protection Agency (EPA) criteria (see Table 2). Levels of total Chromium and total Nickel are consistent with those occurring naturally in soils.

Two off-site incidents are unlikely to result in environmental impairment at the site. These involve waste oil handling at City Auto Wrecking (across Leigh Street northwest of Rehrig) and a UST removal at D.W. Mallory Company (about one half mile from Rehrig).

Rehrig's facility does carry some potential for environmental impairment due to the hazardous materials and petroleum products used in the operations. However, the current Rehrig management has reduced the risk of environmental impairment to a low level by the use of sophisticated equipment, procedures, and safety systems. These include a spill and prevention control plan, removal of a UST, secondary containment dikes, and the removal of waste oil, scrap metal, and hazardous materials from the site. The analyses performed indicated that over the past five years since the previous environmental assessment was conducted, no environmental deterioration is apparent at the site.

TABLE 1 - SAMPLES FROM UST LOCATION

SAMPLE	TPH (ppm)	REPORTING LEVEL (ppm)
B-1	39.0	100.0
B-2	<0.5	100.0
B-3	<0.5	100.0
B-4	<0.5	100.0

TABLE 2 - SAMPLES FROM PLATING AREA

SAMPLE	CHROMIUM (ppm)		NICKEL (ppm)		TCLP CHROMIUM (ppm)		TCLP NICKEL (ppm)	
	H-S	SES	H-S	SES	SES	EPA	SES	EPA
HA-1	40.0	13.5	15.0	3.9	<0.5*	5.0	<.14*	NL
HA-2	NS	54.2	NS	7.0	<0.5*	5.0	<.14*	NL
HA-3	NS	31.0	NS	18.2	<0.5*	5.0	<.14*	NL
HA-4	25.0	19.4	15.0	24.4	<0.5*	5.0	<.14*	NL
HA-5	45.0	116.3	5.0	66.5	<0.5*	5.0	<.14*	NL

Notes: TPH = Total Petroleum Hydrocarbons  
TCLP = Toxicity Characteristic Leaching Procedure  
H-S = Hatcher-Sayre  
SES = Schnabel Environmental Services  
NS = No sample collected by Hatcher-Sayre  
NL = No limits currently established  
\*Levels below detection limits



## 2.0 INTRODUCTION

Rehrig International manufactures shopping carts and other similar products at its facility located at 901 North Lombardy Street, Richmond, Virginia. The location of the facility is shown on the Vicinity Map in Figure 1. The manufacturing process involves metal fabrication, injection molding that produces plastic parts composed of high density polyethylene (HDPE), and metal plating of nickel and chromium onto the metal parts of the shopping cart. Rehrig leases the facility and is concerned that its operation may result in environmental impairment at the site. Radian Corporation, Herndon, Virginia, conducted an environmental site assessment (ESA) at the Rehrig facility in February 1988.

The objective of our study was to update the ESA and provide a report indicating the potential for environmental impairment at the site. Our scope of work included the following:

- Data Collection
- Soil Sampling
- Analytical Chemical Testing
- Environmental Site Assessment Update Report

Our services did not include inspection or testing for contamination such as asbestos, radon, or methane gas. No geotechnical or remedial recommendations, wetland assessments, deed or property record searches, historical site use review, or detailed geohydrologic analysis were included in this study.

### 3.0 SUMMARY OF PREVIOUS STUDIES

To gather data for the ESA in February 1988, Radian conducted a walk-through of the facility to observe plant operations and waste handling, and interviewed plant personnel. Their study included contacting Rehrig's waste oil hauler, the real estate firm who leased the property to Rehrig, and State and Local officials regarding environmental compliance.

Radian's study found that the building was about 100 years old and had been occupied by several businesses. Originally, the building was used to process and store tobacco. Subsequent tenants included the State Penitentiary, a book binding business, and an air filter products manufacturing operation.

From the gathered data, Radian concluded that "the facility was generally clean, free of debris, and appeared to be maintained in good order; no visual evidence of hazardous chemicals at the ground surface posing a threat to the environment was revealed in their investigation, and Rehrig complied with existing permits to generate and store hazardous waste, and to discharge treated wastewater from plating operations to the Richmond Sewer System."

They made the following recommendations:

- An underground diesel fuel tank located on the property should be tested for tightness and registered with the Virginia State Water Control Board (SWCB).
- Sludge from the plating wastewater sump should be handled as a listed waste and that the sump should be periodically checked for leaks and integrity of the epoxy sealer coat.
- Rehrig should contact the City of Richmond regarding discharge of industrial wastewater to determine the need for discharge permits.

A Phase II study was performed in February 1989 by Hatcher-Sayre, Inc., Richmond, Virginia. Hatcher-Sayre also conducted a walk-through of the facility. To evaluate the potential for soil and ground water contamination from both the plating operation and the underground fuel storage tank (UST), Hatcher-Sayre collected soil samples from three locations adjacent to the plating area and three locations adjacent to the UST. Samples taken adjacent to the plating area were analyzed for pH, sulfates, total chromium, hexavalent chromium, and nickel. Based on the chemical test results, they concluded that there was "no evidence of significant leakage from existing or past plating operations." They also suspected that a minor sulfuric acid spill may have occurred at the sample location outside the building adjacent to the plating area, based on the results showing elevated sulfates and low pH values.

To evaluate the UST, Hatcher-Sayre conducted soil vapor analyses at five locations in the vicinity of the UST. No soil samples were tested for total petroleum hydrocarbons. Soil vapors were analyzed with a photoionization device (PID) and values obtained ranged from 0 to 2.6 ppm. From the data, they concluded

that they "found no evidence of hydrocarbons in the tank pit surrounding the underground tank."

#### 4.0 INFORMATIONAL SOURCES

In order to update the previous studies, the EPA CERCLIS, NPL, and DWM (Department of Waste Management) Solid Waste Management Facilities list were reviewed for facilities on those databases within one mile of the site. The SWCB (State Water Control Board) was contacted to obtain VPDES (Virginia Pollution Discharge Elimination System) permits located within one mile of the site. Also, the available SWCB incident lists from January 1988 through December 1992 were reviewed for surface and ground water contamination incidents.

The most recent UST (Underground Storage Tank) files (October 1992) maintained by the SWCB were reviewed for registered tanks. The DWM Hazardous Waste Activity Notifiers List was reviewed to determine if hazardous waste generators, handlers, storers, or transporters of hazardous materials are located on or adjacent to the site. In addition, our office reviewed a DWM search of their files for incidents in the site vicinity. We contacted the Richmond Fire Department regarding responses by them to the assessment site or adjacent properties for hazardous materials (HAZMAT) spills. We contacted Cavanaugh Corporation, W.B. Goode Company, and F.W. Baird in regard to removal and tank tightness testing of the diesel fuel UST.

Rehrig International supplied us with a site plan, copies of Hatcher-Sayre's report and Radian's report, correspondence with the State Water Control Board, and a copy of Rehrig's Wastewater Treatment Plan.

## 5.0 WALK-THROUGH

On March 23, 1993, Russ Harris of Schnabel Environmental Services, accompanied by Randy Daniel of Rehrig, conducted a walk-through of the facility. The purpose of the walk-through was to observe and document the conditions of the facility and visual evidence of environmental impairment. Figures 2 and 3 show the locations of various plant operations, hazardous chemical storage, hazardous waste storage, tool and parts solvent cleaning stations, and locations of bottled gas including compressed argon, nitrogen acetylene, and oxygen. A new plating area was being installed in the central portion of the facility at the time of our site visit.

During the walk-through, we noted that the old plating area is surrounded by an 8 inch high by 7 inch wide concrete dike. This dike provides secondary containment for potential spills from the plating tanks. Adjacent to the area were several empty tanks used to hold chemical solutions while maintenance is performed on the production tanks, or to act as temporary storage during an emergency. Mr. Daniel explained that there have been occasional minor spills within the secondary containment, and that the spilled material was channeled into the wastewater treatment trench that leads to the wastewater treatment system.

An overhead conveyor system is located above the dip tanks in the plating area. Cardboard is placed on the concrete floor below the conveyor to absorb rinse water, and thus prevent a slipping hazard on the concrete floor. Mr. Daniel stated that the rinse process involves eight rinsing stages, the last two of which are water rinses. Mr. Daniel considers the drippings to be "clean" and therefore the cardboard is disposed of in a regular trash dumpster located on site. This dumpster is supplied by Browning-Ferris Industries (BFI), and is emptied for disposal in a municipal sanitary landfill.

Also observed in the plating area, were small fragments of plated metal that had fallen from the plating racks after completion of the plating process. To maintain the cleanliness of the area, these metal fragments are swept up. The metal sweepings, and other scrap metal generated as a result of plant operations are deposited in a Peck dumpster for recycling. Peck Metals retrieves this dumpster, located on the west side of the building, on a regular basis.

We observed some leakage from various hydraulically operated equipment. In some cases, the oil is contained by a metal drip pan located under and around the machine. When the pan reaches a certain level, the oil is retrieved and deposited in a waste hydraulic oil tank located inside the building near the northwest corner. Where machines had no drip pan, oil is soaked up by Oil-Dry crystals which are swept up and disposed of in a dumpster. The dumpster is located on the west side of the building. BFI retrieves the dumpster on a regular basis.

Adjacent to the waste hydraulic oil tank is a tank for clean hydraulic oil. The waste hydraulic oil is collected and the clean oil tank filled on an as-needed basis. These tanks are serviced by

James River Petroleum. The tanks are slightly elevated above a sloping concrete-lined pit, with walls about 2.5 ft high at the north end and 1 ft at the south end, for emergency containment of spills and leaks.

There are three hazardous chemical storage areas and one hazardous waste storage area within the building. One hazardous chemical storage area is located and used at each of the old plating and new plating areas, respectively. The third hazardous chemical storage area is located near the injection molding department. The hazardous waste storage location is located approximately at the center of the plant. The hazardous waste location is cordoned off with chains and clearly marked with "keep out" signs. The hazardous waste is the material collected from the filter press as a result of wastewater treatment in the old plating area. The hazardous waste material is secured in 55 gallon drums which are removed by a licensed carrier on an as-needed basis.

The entire floor within the building consists of concrete. Our sampling indicated that this is a six inch thick slab. Several cracks and some small depressions were noted throughout the plant. However, no cracking was noted in the location of hazardous chemical storage, hazardous waste storage, or the old plating area. In the tubing fabrication area, the floor has a noticeable dark appearance. Mr. Daniel stated that the dark appearance is the result of a black residue that exists on the new wire cable and new metal tubing used for manufacture of the carts.

The new plating area, which was not in operation at the time of our walk-through, is located at the previously existing resin storage area shown on Figure 2. The new plating equipment is located on a 6 inch concrete slab. It is surrounded on three sides (west, north, and east) by an elevated concrete wall and walkway. Essentially, the new plating area is located in a three-sided pit. Rehrig plans to construct a secondary containment dike of concrete similar to that located around the old plating area.

Some of Rehrig's quality control/quality assurance is performed in their small laboratory located in the middle of the building. Observation of the lab showed the lab to be generally clean and all glass and plastic containers were sealed (i.e. no open containers).

## 6.0 ON-SITE ENVIRONMENTAL INCIDENTS SINCE THE 1988 ESA

Several environmental events have occurred at the site since the 1988 ESA by Radian Corporation. These include: closure of a hazardous materials storage area (1990), excavation of a 1,000 gal diesel tank, remediation of hydraulic oil contaminated soil (1991), and installation of new plating equipment.

In October 1990, Rehrig moved one of their hazardous materials storage area. The move involved closure of the former hazardous materials storage area located where the new wastewater treatment system has been installed on the new plating area. The new hazardous materials storage area is located just west of the former location. The former area was officially closed by compliance with Department of Waste Management (DWM) regulations. Rehrig subcontracted Hatcher-Sayre as their consultant for the closure.

A 1000 gallon UST used for storage of diesel fuel was removed on April 14, 1989. F.W. Baird General Contractor removed the tank and backfilled the excavation pit with clean fill. They provided us with a Certificate of Analysis regarding soil samples collected from the excavation. TPH values for composite samples from the excavation and soil stockpile were 100 ppm and 130 ppm, respectively. No formal closure was made to the SWCB by Rehrig.

A letter written by Mr. Daniel to Meade Anderson of the State Water Control Board (SWCB) dated May 20, 1991 described the remediation of hydraulic oil contaminated soil that was encountered during excavation for an injection molding machine foundation at the northwest corner of the facility. It is our understanding that this contamination was related to activities prior to Rehrig occupying the site. A letter dated July 18, 1991 by Jim Tucker of Rehrig to the SWCB explained that a volume of soil about 8 ft wide by 36.5 ft long by 8 ft deep was excavated and disposed of. Again, Rehrig subcontracted Hatcher-Sayre as their consultant for closure. Meade Anderson at the SWCB provided us with the pollution complaint number (PC 92-421), and verified that the closure was completed to the satisfaction of the SWCB.

A second incident, reported to us by Rehrig, occurred in the old plating area, December 5, 1992. According to Rehrig, sodium hydrosulfite which is a caustic added as part of the wastewater treatment process, spilled onto the concrete floor. This compound was swept up and placed into a 55 gallon metal drum. Apparently the drum contained some water whereupon a reaction occurred which resulted in an emission of smoke and fumes. The supervisor in the area responded immediately and placed oil dry into the container to stop the chemical reaction. He also dialed the 911 emergency number to summon the local fire department. Also the emergency chemical hotline was called. He ordered company personnel to evacuate the premises. When the fire department arrived, the reaction was under control in the drum. The reaction was kept under surveillance for a period of four hours to allow the smoke and fumes to dissipate. No personnel were injured, and no damage to the facility's equipment or premises occurred.

Recent construction of a new plating operation was in progress during our walk-through. The construction is near completion and operation is expected to begin soon. We noted that the new machinery rests on top of a 6-inch, sealed, reinforced, concrete slab as previously described in Section 4.0. The new machinery is equipped with a state-of-the-art ventilation system and scrubber which will collect and treat the vapors generated from the plating process.



## 7.0 SUBSURFACE INVESTIGATION

Six hand auger probes and two test borings were drilled at the site on February 23, and March 18, 1993, to collect soil samples for chemical analysis. The locations are indicated on Figures 4 and 5. Appendix A contains the boring logs and hand auger logs.

Prior to collecting the hand auger samples in the old and new plating areas, we cored through the concrete slab. The samples were collected from about 12 inches below finish floor grade for HA-2, HA-3, HA-4, HA-5 and HA-6. We hand augured to a depth of 3.5 ft below the sidewalk grade for the HA-1 sample. The HA-1 sample was collected from the 3-3.5 ft interval. This is the approximate depth of the wastewater tank in the building. The sample depths were selected to allow direct comparison to the study performed by Hatcher-Sayre. No sample was taken at the HA-4 location due to encountering a second concrete slab about four inches below the top slab. The hole was therefore abandoned. Appendix A contains the hand auger logs. All hand auger holes were backfilled with the remaining cuttings, with the remainder of corehole void filled with concrete. The top few inches of the coreholes were backfilled with a non-shrink grout.

Two test borings were drilled at the location of the diesel tank to provide support information for tank closure documentation. Duplicate sets of soil samples were collected by split spoon sampler at each test boring location and at each sampling interval. After placing soil samples in glass jars, one set of jars was inverted and remained exposed to the ambient air temperature for several hours. This set of soil samples was later checked for petroleum hydrocarbon vapors with a photoionization device (PID). The other set was placed in a cooler containing ice for later transport to EnviroCompliance Laboratories, Ashland, Virginia.

Samples were visually classified in the Unified Soil Classification System according to ASTM D-2487. Soils classified as clayey sand (SC), sandy lean clay (CL), or sandy lean clay fill. All test boreholes were backfilled with the auger cuttings.

Prior to our subsurface sampling, all equipment was decontaminated by steam cleaning and/or washing with a soap solution and rinsing with distilled water. After each sampling interval, the hand auger or split spoon and plug used in test borings, was again decontaminated with the procedure above. This procedure reduces the contamination potential of the soil at increased depths from the soil above. Appendix B contains the detailed procedure of our soil sampling protocol.

## 8.0 CHEMICAL LABORATORY TESTING

Five soil samples collected from the old and new plating areas were tested for pH, sulfates, total chromium, total nickel, and toxicity characteristic leaching procedure (TCLP) for nickel and chromium. The total metal analysis was selected to facilitate comparison to the Hatcher-Sayre data. The TCLP analysis was conducted to determine whether the metals were above hazardous levels set by the EPA. Results of the testing are included in Appendix C and a summary of the results in Table 3.

The pH values ranged from 4.6 (HA-1) to 9.05 (HA-3). With the exception of the 9.05 pH value, these levels are within the normal range of pH value for the lean clay and clayey sand soils found in the Richmond vicinity. A possible explanation for the 9.05 (HA-3) value may be from contamination of the soil sample with the alkaline cutting liquids generated during the concrete coring process. Another possible source of error lies within the inherent variability of the pH test itself.

Sulfates content of the five hand auger samples ranged from 9.6 to 130.8 ppm. These values are in the normal range for the lean clay soils and clayey sand soils found in the Richmond vicinity. Note that the sulfates content of our HA-1 sample was 9.6 ppm and is much less than the 386.4 ppm result by Hatcher-Sayre. A possible explanation for this large difference may be the heterogeneous nature of soil itself, or possible lab error.

Total nickel values ranged from 3.9 to 66.5 ppm with the HA-6 sample having the highest total nickel content. Total nickel concentrations in United States soils have an average concentration of 40 ppm (Reference 7). Values for total chromium ranged from 13.5 to 116.3 ppm. Total chromium values for U.S. soils range from 1 to 1500 ppm and average 100 ppm. The highest value of total chromium was 116.3 ppm at the HA-6 sample location.

TCLP nickel and chromium were below the detection limits for all the samples. The results indicate that the naturally occurring nickel and chromium in the soil is relatively immobile, and will not migrate or leach out of the soil complex.

The samples obtained from test borings B-1 and B-2, located in the vicinity of a previously existing UST, were screened with a photoionization device (PID). The sample with the highest reading (25 ppm) occurred at a sample depth of 13.5-15.0 ft in boring B-1. This sample along with the B-2 sample at the same depth was submitted for total petroleum hydrocarbons (TPH) testing. These samples appeared to be the naturally occurring Pleistocene terrace soils.

Two other samples were tested for TPH and were taken from the 4-5.5 ft sampling interval. The 4-5.5 ft samples appeared to be a fill material as noted by the inclusion of asphalt fragments in the soil matrix. The transition between the 4-5.5 ft and 7-8.5 ft samples appear to be at the contact between fill and natural soils. We therefore submitted these samples for TPH testing.

**TABLE 3 - LABORATORY ANALYSES RESULTS**

SAMPLE IDENTIFICATION	DEPTH (ft)	pH	TOTAL CHROMIUM (ppm)	TOTAL NICKEL (ppm)	SULFATES (ppm)	TCLP (ppm)	
						Ni	Cr
HA-1 (HA-3)	3-3.5 (3-3.5)	4.61 (5.2)	13.5 (40)	3.9 (15)	9.6 (385)	BDL	BDL
HA-2	0.7-1.2	6.50	54.2	7.0	115.4	BDL	BDL
HA-3	0.8-1.5	9.05	31.0	18.2	84.6	BDL	BDL
HA-5 (HA-1)	0.7-1.0 (1-1.5)	8.29 (7.7)	19.4 (25)	24.4 (15)	130.8 (98)	BDL	BDL
HA-6 (HA-2)	0.7-1.2 (1-1.5)	7.58 (7.4)	116.3 (45)	66.5 (5)	169.2 (280)	BDL	BDL
DETECTION LIMIT	-	-	0.1	3.5	5.0	0.14	0.5
REFERENCE METHOD	-	SW-846, METHOD 9045	SW-846, METHOD 7191	SW-846, METHOD 7521	MCAWW, METHOD 375.4	SW-846, TCLP EXTRACTION METHOD 1311	

\* VALUES IN PARENTHESES ARE THOSE OBTAINED BY HATCHER-SAYRE, INC. (1989).

SAMPLE IDENTIFICATION	DEPTH (FT)	PID* VALUE	TPH** VALUE (PPM)
B-1	4-5.5	0	39.0
B-1	13.5-15.0	25	BDL
B-2	4-5.5	0	BDL
B-2	13.5-15.0	0	BDL
DETECTION LIMIT	-	-	5.0
REFERENCE METHOD	-	-	SW-846 MODIFIED METHOD 8015 (CALIFORNIA TPH FOR SEMI-VOLATILES AS DIESEL

\* PID = Photoionization device

\*\* TPH = Total Petroleum Hydrocarbons

Test results of three samples showed TPH values below the detection limit. The sample from 4-5.5 ft in test boring B-1 had a TPH value of 39 ppm. A TPH value less than 100 ppm is not considered reportable by the SWCB.

## 9.0 ENVIRONMENTAL SITE ASSESSMENT UPDATE

Our data review indicates that while there are no NPL or CERCLIS sites within one mile of Rehrig, the facility itself is still listed on the CERCLIS with a "no further action" status. Rehrig is also listed as a hazardous waste generator, handler, and storer. Rehrig's EPA number is VAD089028377. Transport of the hazardous waste is conducted by a licensed carrier. Although Rehrig treats its wastewater and discharges it to the City of Richmond's sewer system, the Virginia Pollution Discharge Elimination system (VPDES) does not require a permit, since Rehrig's treated wastewater is not directly discharged into any nearby body of water. No adjacent facilities have VPDES permits according to SWCB records.

We further understand that Rehrig is permitted and in compliance with Richmond's wastewater discharge to the municipal sewer system. We understand from Randy Daniel that in September of 1988, Rehrig incurred a violation of their wastewater permit as evident by chemical test results which indicated they had exceeded the nickel and chromium limits. This was a result of the wastewater treatment system not functioning properly. Rehrig brought the system into compliance within a four week period allowed by the City following the occurrence. Rehrig accomplished this by installing equipment that added more stages in the wastewater treatment process. Although the potential for environmental impairment is low to moderate in the wastewater treatment area, the risks have been reduced by good maintenance and periodic inspection of the system.

As described in Section 5.0, Randy Daniel informed us that Rehrig performed closure of a hazardous materials storage area about two years ago. Rehrig also remediated and closed the hydraulic oil contaminated soil to SWCB's satisfaction at the injection molding machine at the north end of the facility. The potential environmental impairment is low at these two locations based on Rehrig's past activities at the time of our investigation.

Rehrig's new plating operation has some potential for environmental impairment to the site. However, the risk of impairment is reduced due to the secondary concrete containment.

Rehrig has a comprehensive plan to control chemical wastes generated by the molding and plating departments. Spill prevention, toxic organic management, baseline monitoring, and a self-monitoring report are included in the plan that was formally implemented in August 1991. We have reviewed this plan and found that it addresses the issues of both human safety and facility integrity. It also includes documentation which shows compliance with the Richmond Department of Public Utilities regulations. The implementation and existence of the plan reduces the risk of environmental impairment to the site.

The incident (PC No. 92-421) which entailed removal of hydraulic oil contaminated soil is considered closed by SWCB (personal communication, Meade Anderson, SWCB). The environmental impairment to the Rehrig site at this location is considered to be

low. The sodium hydrosulfite incident is also unlikely to impair the site as it was contained and remediated on site.

The range of values obtained during this study for pH, sulfates, total nickel, total chromium, and extractable nickel and chromium, compare favorably with the H-S results with one exception. Our sulfates concentration of 9.6 ppm at HA-1 was much lower than the result obtained by H-S. The large difference may possibly be attributed to the inherent heterogeneous nature of soil, differences in locations, lab testing variability, or a combination. Nonetheless, as best as a limited quantity of data from different sources may be compared, we find that no significant variation exists among the data.

The UST containing diesel fuel has been removed and consequently the major source of possible contamination to the site by a leaking UST has also been removed. At the time the UST was removed, samples collected from the excavation and stockpiled soils were at or above the reporting level of 100 mg/kg. We contacted the SWCB regarding tank closure. They indicated that they were unable to give a specific ruling in this case. However, they stated that since the tank was not registered and that the tank was removed prior to UST Corrective Action Requirements becoming effective on October 25, 1989, it is unlikely that the SWCB would pursue the matter. They do always retain the option to open a case should contamination be discovered at a later date. The risk of environmental impairment from the removed tank is low, based on the TPH data which are well below reportable limits and that the tank has been removed.

Oil stains were found on the concrete floor slab throughout the Rehrig facility. These stains are likely attributed to motor oil, hydraulic fluid, or transmission fluid leaking from the company forklifts. These minor contacts with the floor should not significantly impair the site as the concrete floor is 6 inches thick and serves as a barrier to penetration by these fluids.

The City of Richmond has a municipal transfer station located at 500 School Street, behind Emrick Chevrolet. No USTs are registered with SWCB on site or off site on adjacent properties. No hazardous waste transport, storage or treatment facilities, sanitary landfills, sewage treatment facilities, or industrial wastewater discharge facilities were registered within one mile of the assessment site on available records.

One incident recorded by SWCB (PC No. 93-084) involved sloppy housekeeping of waste oil at City Auto Wrecking located at 2050 West Moore Street. This site is located across Leigh Street from the NW corner of Rehrig's facility. David Bowie of SWCB walked the property on September 8, 1992. From his investigation, he identified areas where oil spillage could occur. He recommended that these areas be cleaned up. He made a followup visit on October 7, 1992 and observed that the areas had been cleaned up. The case was considered closed as indicated in a letter dated November 5, 1992 addressed to City Auto Wrecking. This incident has a low risk of environmental impairment to the Rehrig facility.

Another incident (PC No. 92-1902) involved a UST closure at the old D.W. Mallory Company located at the 900 block of Hermitage Road and Leigh Street. The site is about one half mile from Rehrig's facility and unlikely to impair Rehrig's site.

Rehrig's facility does carry some potential for environmental impairment due to the hazards materials and petroleum products used in the operations. However, the current Rehrig management has reduced the risk of environmental impairment to a low level by the use of sophisticated equipment and safety systems. These include a spill and prevention control plan, removal of a UST, secondary containment dikes, and the removal of waste oil, scrap metal, and hazardous materials from the site. The analyses performed indicated that over the past five years since the previous environmental assessment was conducted, no environmental deterioration is apparent at the site.

## 10.0 LIMITATIONS

This report was prepared for your use in accordance with the agreed upon scope of services. We have not addressed any issues which may concern the health and safety of Rehrig personnel, as this was not included in our scope of work. Our services were intended to provide an indication of the potential for environmental impairment at the site. We have not included any study of the potential impact that Rehrig's discharges to the air or the municipal sewer system could have. The conclusions provided in this report are based solely on the information reported in this document. Additional information with respect to this site or nearby sites which was not available to us at the time of this assessment, could modify the conclusions stated herein. In addition, our study is only valid for the time it was performed.

This report has been prepared in accordance with generally accepted environmental practices and we make no other warranties either express or implied, as to the professional advice provided under the terms of our agreement and included in this report.



## REFERENCES

1. Master List of Virginia Sites on the National Priority List of Superfund Sites; prepared by the Virginia Department of Waste Management, July 1991.
2. Master List of Virginia Hazardous Waste Handlers; prepared by the Virginia Department of Waste Management, October 11, 1992.
3. Master List of Permitted Solid Waste Facilities in Virginia; prepared by the Virginia Department of Waste Management, February 1992.
4. Master List of Underground Storage Tanks, prepared by the Virginia Water Control Board, October 1992.
5. Master List of Reported Environmental Incidents, prepared by the Virginia Water Control Board, July 1985 to December 1992.
6. Master List of Known, Alleged or Potential Hazardous Waste Sites in Virginia; prepared by U.S. EPA for CERCLIS, October 30, 1992.
7. Buckman, Harry O., and Nyle C. Brady, The Nature and Properties of Soils, Published by Macmillan Company, 1969, pp. 290-297, 402-403.

# ENVIRONMENTAL SITE ASSESSMENT

## UPDATE

REHRIG FACILITY  
901 N LOMBARDY STREET  
RICHMOND, VIRGINIA

### LEGEND

- ① UST, OLD D.W.W MALLORY CO., HERMITAGE ROAD AND LEIGH STREET (SWCB)
- ② CITY AUTO WRECKING, 2050 WEST MOORE STREET (SWCB)
- ③ RICHMOND MUNICIPAL TRANSFER STATION, 500 SCHOOL (DWM)

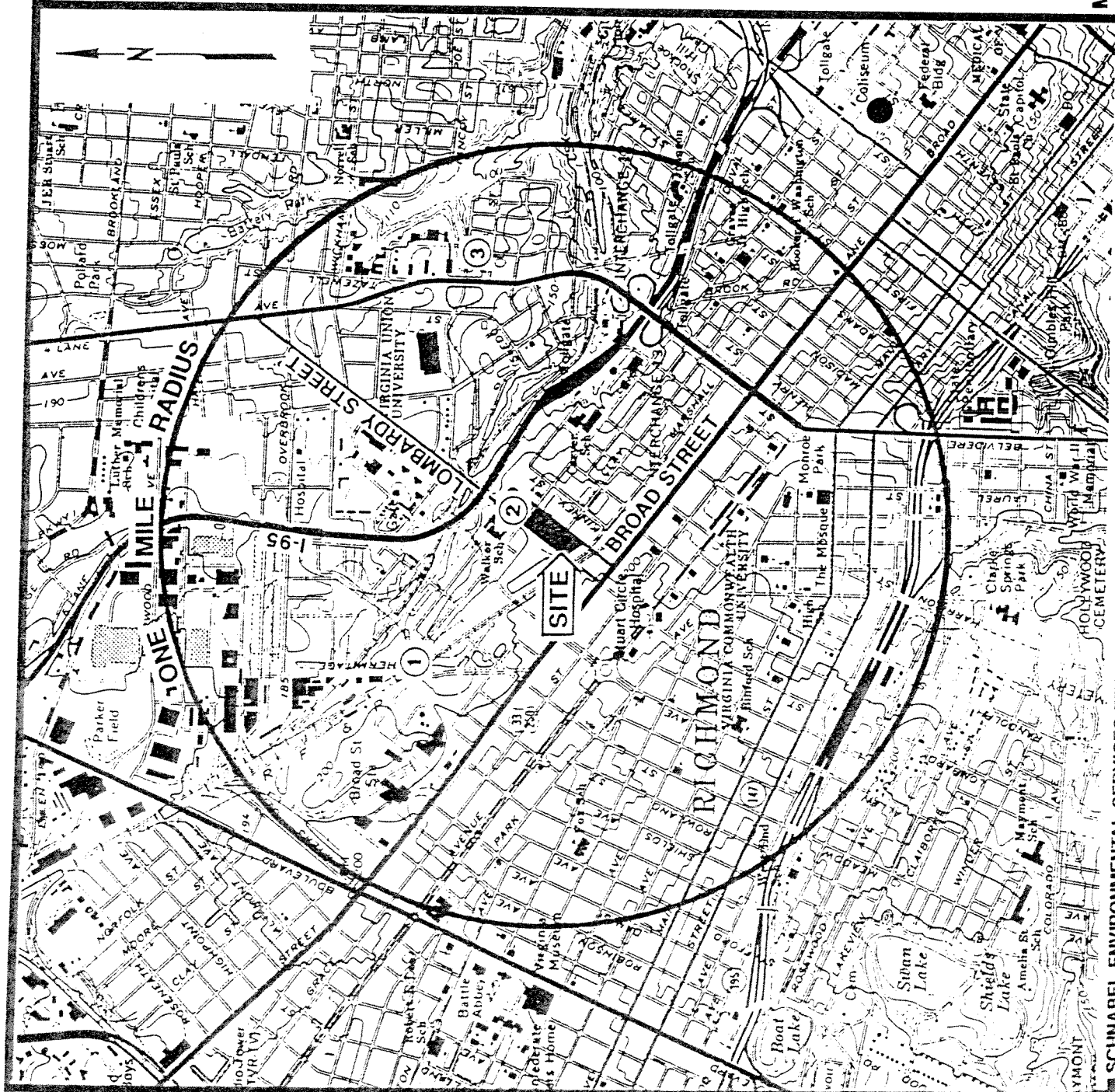
FIGURE 1  
VICINITY MAP

SCALE: 1"=2000'

SOURCE: RICHMOND, VA. (1964,  
PHOTOREVISED 1981)  
7.5' USGS QUAD

MARCH 1993

933083



AREA OF CLOSURE  
DUE TO PETROLEUM  
CONTAMINATED SOIL

WASTE HYDRAULIC OIL TANKS  
CLEAN HYDRAULIC OIL TANKS

TOOL CLEANING STATION

MOLDING MACHINES

REGRIND STORAGE

REGRIND MACHINE

BASKET STORAGE

MOLDING MACHINES

AIR COMPRESSOR AND DRYER

CHEMICAL STORAGE FOR PLATING

BOILER THAT RUNS OLD PLATING

SOLID HAZARDOUS WASTE STORAGE PICK UP BY LICENSED CARRIER

PLATING LAB

STORAGE TANKS FOR MAINTENANCE

DIKE

CONTAINMENT AREA

OLD PLATING AREA

ACID STORAGE AREA FOR TANKS

PARTS STORAGE (PLATED PARTS READY FOR ASSEMBLY)

PARTS STORAGE

LIQUID WASTE TREATMENT

CHEMICAL STORAGE

NEW PLATING LINE

BOILER

HEAT EXCHANGER

5 ARSON GAS BOTTLES

2 ROBOTIC WELDERS

MANUAL WELDING

TRASH DUMPSTER

WASTE HYDRAULIC OIL TANKS

CLEAN HYDRAULIC OIL TANKS

LIQUID TREATMENT SYSTEM

FILTER PRESS

POLYESTER DIP TANK

WATER DIP TANK

DRYING OVEN

PLASTIC STORAGE

CHILLED WATER

SEAT BACK STORAGE

AIR COMPRESSOR

LIQUID WASTE TREATMENT

CHEMICAL STORAGE

NEW PLATING LINE

BOILER

HEAT EXCHANGER

5 ARSON GAS BOTTLES

2 ROBOTIC WELDERS

MANUAL WELDING

TRASH DUMPSTER

WASTE HYDRAULIC OIL TANKS

CLEAN HYDRAULIC OIL TANKS

LIQUID TREATMENT SYSTEM

FILTER PRESS

POLYESTER DIP TANK

WATER DIP TANK

DRYING OVEN

PLASTIC STORAGE

CHILLED WATER

SEAT BACK STORAGE

AIR COMPRESSOR

LIQUID WASTE TREATMENT

CHEMICAL STORAGE

NEW PLATING LINE

BOILER

HEAT EXCHANGER

5 ARSON GAS BOTTLES

2 ROBOTIC WELDERS

MANUAL WELDING

TRASH DUMPSTER

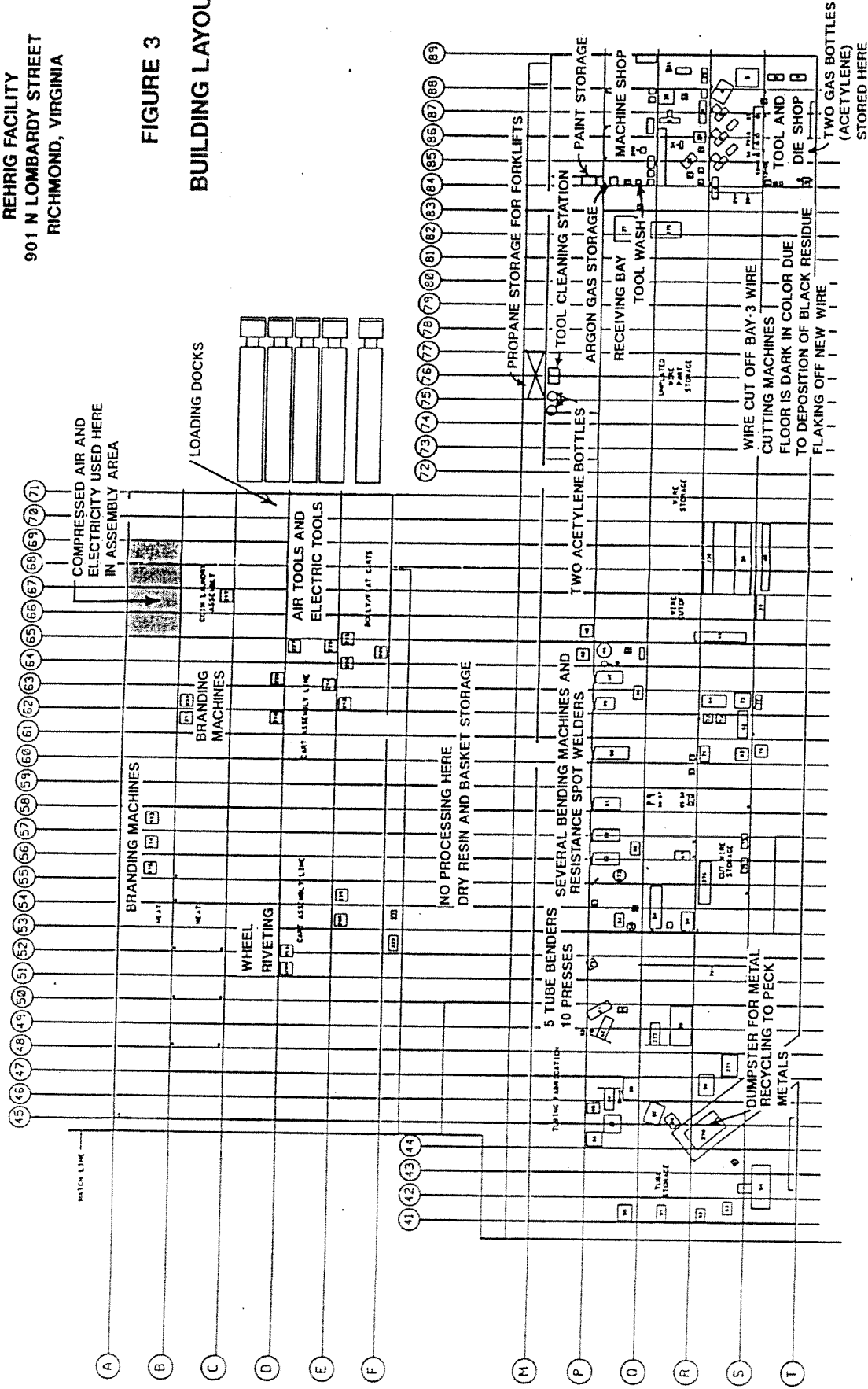
WASTE HYDRAULIC OIL TANKS

CLEAN HYDRAULIC OIL TANKS

EQUIPMENT LAYOUT  
SCALE: 1"=50'

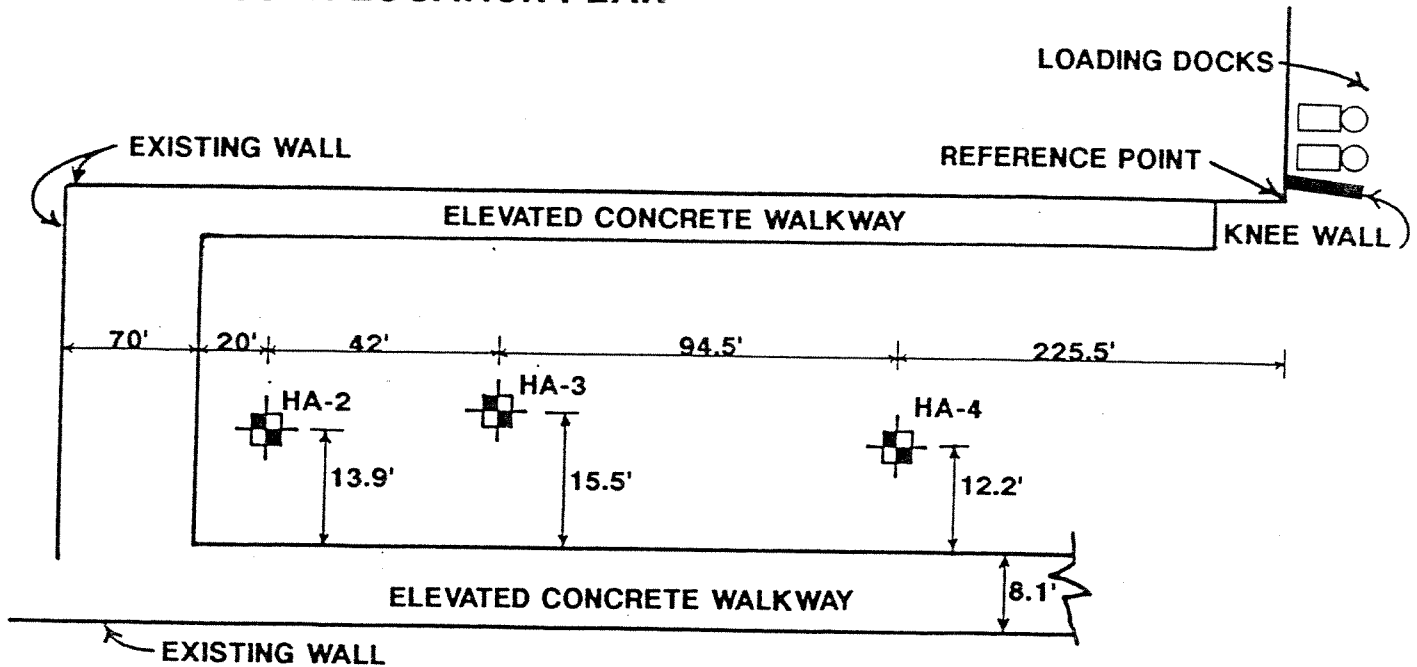
FIGURE 3

BUILDING LAYOUT

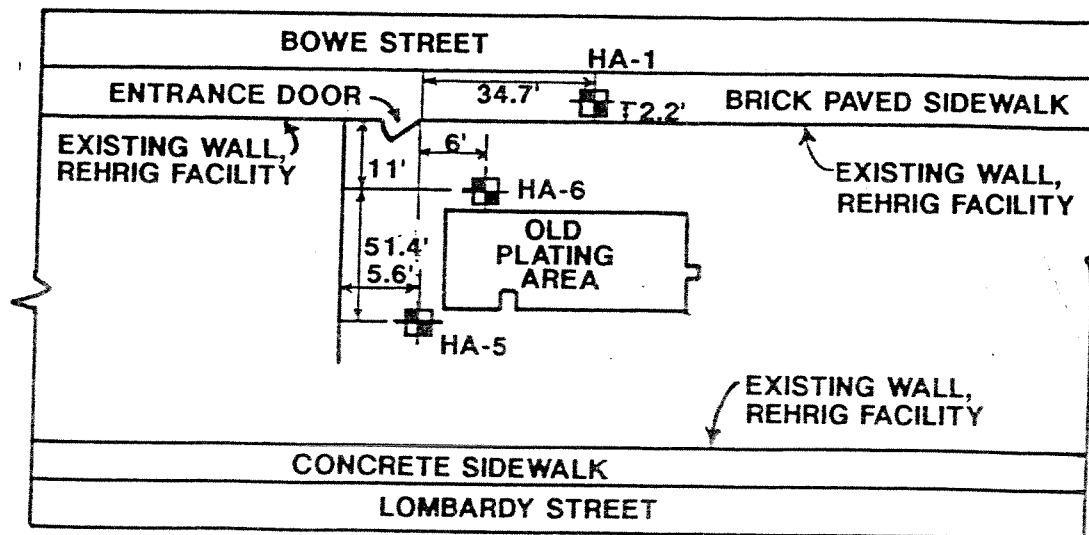


EQUIPMENT LAYOUT  
 SCALE 1"=50' ±

FIGURE 4  
HAND AUGER LOCATION PLAN



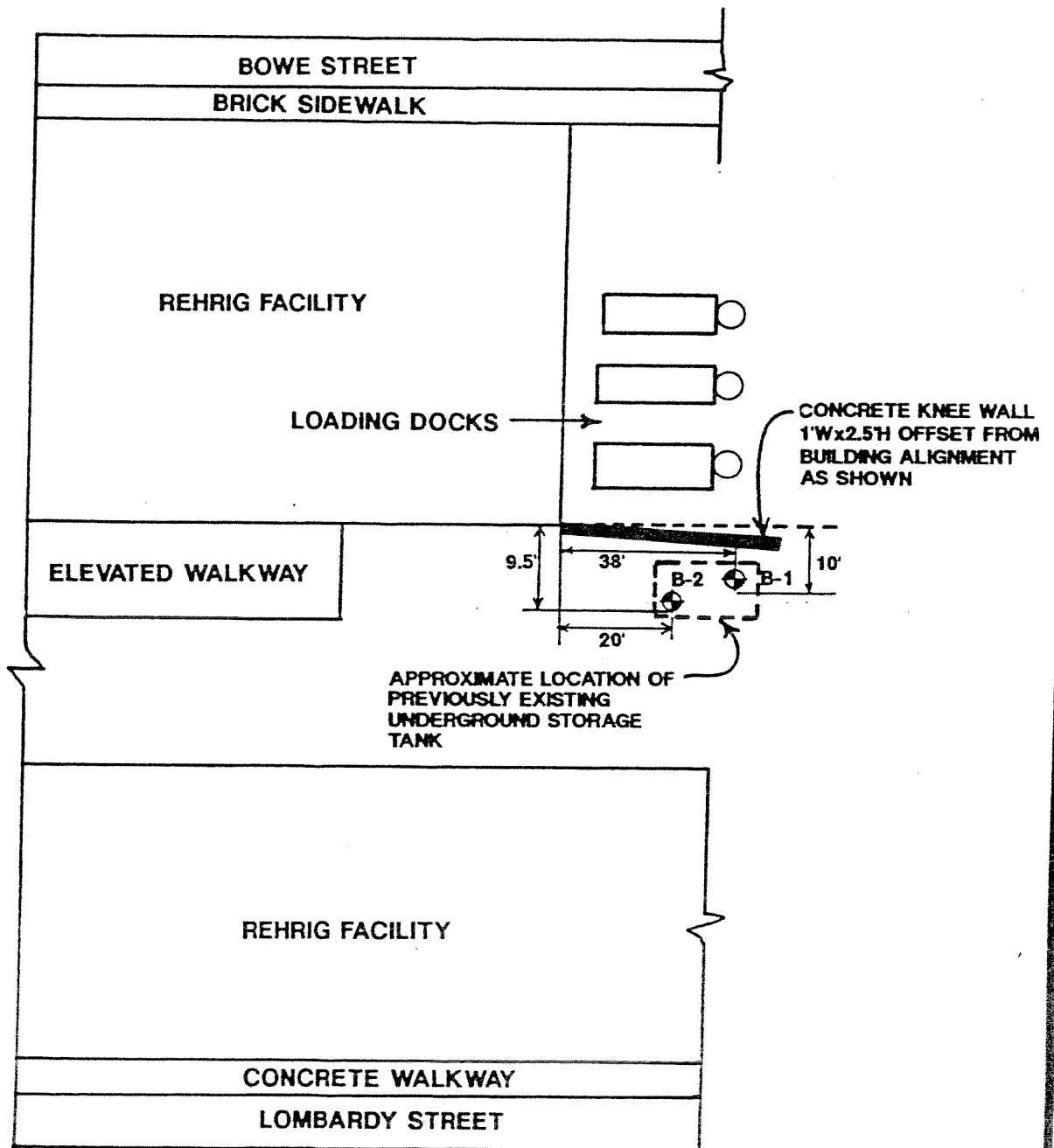
NEW PLATING AREA  
NOT TO SCALE



OLD PLATING AREA  
NOT TO SCALE

ENVIRONMENTAL SITE ASSESSMENT UPDATE  
REHRIG FACILITY  
901 N LOMBARDY STREET  
RICHMOND, VIRGINIA

FIGURE 5  
TEST BORING LOCATION PLAN



LOADING DOCK AREA  
NOT TO SCALE

**APPENDIX A**

**TEST BORING LOGS AND HAND AUGER LOGS**

SCHNABEL ENGINEERING ASSOCIATES, INC.

GENERAL NOTES FOR TEST BORING LOGS

1. NUMBERS IN SAMPLING DATA COLUMN NEXT TO STANDARD PENETRATION TEST (SPT) SYMBOLS INDICATE BLOWS REQUIRED TO DRIVE A 2 INCH O.D., 1-3/8 INCH I.D. SAMPLING SPOON 6 INCHES USING A 140 POUND HAMMER FALLING 30 INCHES. THE STANDARD PENETRATION TEST N VALUE IS THE NUMBER OF BLOWS REQUIRED TO DRIVE THE SAMPLER 12 INCHES, AFTER A 6 INCH SEATING INTERVAL. THE STANDARD PENETRATION TEST IS PERFORMED IN ACCORDANCE WITH ASTM D-1586.

2. VISUAL CLASSIFICATION OF SOIL IS IN ACCORDANCE WITH TERMINOLOGY SET FORTH IN "IDENTIFICATION OF SOIL." THE ASTM D-2487 GROUP SYMBOLS (e.g. CL) SHOWN IN THE CLASSIFICATION COLUMN ARE BASED ON VISUAL OBSERVATIONS.

3. ESTIMATED GROUND WATER LEVELS INDICATED BY ▼; THESE LEVELS ARE ONLY ESTIMATES FROM AVAILABLE DATA AND MAY VARY WITH PRECIPITATION, POROSITY OF THE SOIL, SITE TOPOGRAPHY, ETC.

4. REFUSAL AT THE SURFACE OF ROCK, BOULDER, OR OBSTRUCTION IS DEFINED AS AN SPT RESISTANCE OF 100 BLOWS FOR 2 INCHES OR LESS OF PENETRATION.

5. THE BORING LOGS AND RELATED INFORMATION DEPICT SUBSURFACE CONDITIONS ONLY AT THE SPECIFIC LOCATIONS AND AT THE PARTICULAR TIME WHEN DRILLED. SOIL CONDITIONS AT OTHER LOCATIONS MAY DIFFER FROM CONDITIONS OCCURRING AT THESE BORING LOCATIONS. ALSO, THE PASSAGE OF TIME MAY RESULT IN A CHANGE IN THE SUBSURFACE SOIL AND GROUND WATER CONDITIONS AT THE BORING LOCATIONS.

6. THE STRATIFICATION LINES REPRESENT THE APPROXIMATE BOUNDARY BETWEEN SOIL AND ROCK TYPES AS OBTAINED FROM THE DRILLING AND SAMPLING OPERATION. SOME VARIATION MAY ALSO BE EXPECTED VERTICALLY BETWEEN SAMPLES TAKEN. THE SOIL PROFILE, WATER LEVEL OBSERVATIONS AND PENETRATION RESISTANCES PRESENTED ON THESE BORING LOGS HAVE BEEN MADE WITH REASONABLE CARE AND ACCURACY AND MUST BE CONSIDERED ONLY AN APPROXIMATE REPRESENTATION OF SUBSURFACE CONDITIONS TO BE ENCOUNTERED AT THE PARTICULAR LOCATION.

7. KEY TO SYMBOLS AND ABBREVIATIONS:

■ 5+10+15	STANDARD PENETRATION TEST
■ 3T	2" OR 3" UNDISTURBED TUBE SAMPLE
24/18	LENGTH PUSHED/RECOVERY (IN INCHES)
PM	PRESSUREMETER TEST (IN REMARKS COLUMN)
do	DITTO
WOW	WATER OBSERVATION WELL
PP	POCKET PENETROMETER READING (TSF)
OVA	ORGANIC VAPOR ANALYZER READING (PPM)



<b>SCHNABEL ENGINEERING ASSOCIATES</b> <b>CONSULTING GEOTECHNICAL ENGINEERS</b> <b>TEST BORING LOG</b>	<b>Project: ESA UPDATE, REHRIG FACILITY</b>	<b>Contract Number: 933083</b> <b>Boring Number: B-1</b> <b>Sheet: 1 Of 1</b>
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Boring Contractor: AYERS & AYERS, INC.  
 POWHATAN, VIRGINIA  
 Boring Foreman: F. ELGIN  
 Drilling Method: 2 1/4" HOLLOW STEM AUGER  
 Drilling Equipment: CME-45  
 SEA Representative: G. ATHAS  
 Dates Started: 03/18/93 Completed: 03/18/93  
 Location: 901 N. LOMBARDY STREET  
 RICHMOND, VIRGINIA  
 Ground Surface Elevation: 97.6 ±

Groundwater Observations					
	Date	Time	Depth	Casing	Caved
Encountered	3-18	10:46	-	-	-
Completion	3-18	10:49	DRY	-	-
Casing Pulled	3-18	10:57	DRY	-	6.3

DEPTH (FT.)	STRATA DESCRIPTION	CLASS.	ELEV. (FT.)	STRATUM	SAMPLING DATA	w (%)	REMARKS
	FAT CLAY WITH SAND FILL, TRACE GRAVEL, MOIST - RED-BROWN		95.6	A	3+2+10		FILL PID = 0 PPM
					3+3+2		FILL PID = 0 PPM
	FINE TO COARSE POORLY GRADED SAND FILL, MOIST - BROWN				9+9+7		FILL PID = 0 PPM
	do, CONTAINS ASHPALT						
6.0	FINE TO MEDIUM SANDY LEAN CLAY (CL) MOIST - BROWN	CL	91.6		3+5+8		PID = 0 PPM
							PLEISTOCENE TERRACE
	do, BROWN, RED AND GRAY		87.6	B	4+6+8		PID = 0.4 PPM
10.0							
					5+6+7		PID = 25 PPM
15.0			82.6				
	BOTTOM OF BORING @ 15.0 FT.						

Comments:

- 1) BACKFILLED UPON COMPLETION
- 2) ELEVATIONS ASSUMED WITH TOP OF ADJACENT WALL TO WEST = 100.0.

<b>SCHNABEL ENGINEERING ASSOCIATES</b> <b>CONSULTING GEOTECHNICAL ENGINEERS</b> <b>TEST BORING LOG</b>		<b>Project: ESA UPDATE, REHRIG FACILITY</b>		<b>Contract Number: 933083</b> <b>Boring Number: B-2</b> <b>Sheet: 1 Of 1</b>																																																	
<b>Boring Contractor: AYERS &amp; AYERS, INC.</b> <b>POWHATAN, VIRGINIA</b> <b>Boring Foreman: F. ELGIN</b> <b>Drilling Method: 2 1/2" HOLLOW STEM AUGER</b> <b>Drilling Equipment: CME-45</b>  <b>SEA Representative: G. ATHAS</b>  <b>Dates      Started: 03/18/93      Completed: 03/18/93</b>  <b>Location:                      901 N. LOMBARDY STREET</b> <b>   RICHMOND, VIRGINIA</b>  <b>Ground Surface Elevation: 97.5 ±</b>			<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th colspan="6" style="text-align: center;">Groundwater Observations</th> </tr> <tr> <th></th> <th>Date</th> <th>Time</th> <th>Depth</th> <th>Casing</th> <th>Caved</th> </tr> <tr> <td>Encountered</td> <td>3-18</td> <td>-</td> <td>DRY</td> <td>-</td> <td>-</td> </tr> <tr> <td>Completion</td> <td>3-18</td> <td>11:24</td> <td>DRY</td> <td>-</td> <td>-</td> </tr> <tr> <td>Casing Pulled</td> <td>3-18</td> <td>11:30</td> <td>DRY</td> <td>-</td> <td>7.1</td> </tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </table>			Groundwater Observations							Date	Time	Depth	Casing	Caved	Encountered	3-18	-	DRY	-	-	Completion	3-18	11:24	DRY	-	-	Casing Pulled	3-18	11:30	DRY	-	7.1																		
Groundwater Observations																																																					
	Date	Time	Depth	Casing	Caved																																																
Encountered	3-18	-	DRY	-	-																																																
Completion	3-18	11:24	DRY	-	-																																																
Casing Pulled	3-18	11:30	DRY	-	7.1																																																
DEPTH (FT.)	STRATA DESCRIPTION	CLASS.	ELEV. (FT.)	STRA- TUM	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th style="width:10%;">DEPTH</th> <th style="width:10%;">DATA</th> </tr> <tr><td>7+9+6</td><td></td></tr> <tr><td>2+3+4</td><td></td></tr> <tr><td>3+3+4</td><td></td></tr> <tr><td>- 5 -</td><td></td></tr> <tr><td>3+5+8</td><td></td></tr> <tr><td>4+4+8</td><td></td></tr> <tr><td>4+5+9</td><td></td></tr> <tr><td>- 15 -</td><td></td></tr> </table>	DEPTH	DATA	7+9+6		2+3+4		3+3+4		- 5 -		3+5+8		4+4+8		4+5+9		- 15 -		w (%)	REMARKS																												
DEPTH	DATA																																																				
7+9+6																																																					
2+3+4																																																					
3+3+4																																																					
- 5 -																																																					
3+5+8																																																					
4+4+8																																																					
4+5+9																																																					
- 15 -																																																					
6.0	FINE TO MEDIUM SANDY LEAN CLAY FILL, CONTAINS GRAVEL AND ASPHALT, MOIST - BROWN AND BLACK do, RED		91.5	A			PID = 0 PPM FILL  PID = 0 PPM  PID = 0 PP,  PID = 0 PPM PLEISTOCENE TERRACE  PID = 0 PPM    PID = 0 PPM																																														
15.0	FINE SANDY LEAN CLAY (CL), MOIST - BROWN AND RED  do, BROWN, RED AND GRAY	CL	82.5	B			BOTTOM OF BORING @ 15.0 FT.																																														

**Comments:**

- 1) BACKFILLED UPON COMPLETION.
- 2) ELEVATIONS ASSUMED WITH TOP OF ADJACENT WALL TO WEST = 100.0.

**SCHNABEL ENGINEERING ASSOCIATES, INC.**

# HAND AUGER LOG

**CONTRACT NO: 933083**

**HAND AUGER NO: HA-1**

**PROJECT: ESA UPDATE, REHRIG FACILITY**

**LOCATION:** 901 N. LOMBARDY STREET  
RICHMOND, VA

**SURFACE ELEVATION:** 99.6 ±

**GROUNDWATER ELEVATION: DRY**

EQUIPMENT: HAND AUGER

SEA REPRESENTATIVE: DOMINIQUE SNYDER

**DATE: 2-23-93**

**TIME: 11:40 AM**

[illegible]

**SCHNABEL ENGINEERING ASSOCIATES, INC.**

# HAND AUGER LOG

**CONTRACT NO: 933083**

**HAND AUGER NO: HA-2**

**PROJECT: ESA UPDATE, REHRIG FACILITY**

**LOCATION:** 901 N. LOMBARDY STREET  
RICHMOND, VA

**SURFACE ELEVATION:** 96.8 ±

GROUNDWATER ELEVATION: DRY

EQUIPMENT: HAND AUGER

SEA REPRESENTATIVE: DOMINIQUE SNYDER

**DATE: 2-23-93**

**TIME: 10:05 AM**

DEPTH	ELEVATION	STRATUM	DESCRIPTION OF SOIL AND OBSERVATIONS	REMARKS
-0.5 0.7	96.0	A	CONCRETE SLAB	FILL
-			CRUSHED STONE FILL, MOIST - GRAY	SAMPLE TAKEN FROM 0.7 TO 1.2 FT
-1.5		B	LEAN CLAY (CL), TRACE SAND, MOIST - RED BROWN	
-          			HAND AUGER TERMINATED AT 1.5 FT	ELEVATION REFERENCED TO ELEVATED WALKWAY (ASSUMED EL 100)

**SCHNABEL ENGINEERING ASSOCIATES, INC.**

# HAND AUGER LOG

**CONTRACT NO: 933083**

**HAND AUGER NO: HA-3**

**PROJECT: ESA UPDATE, REHRIG FACILITY**

**LOCATION:** 901 N. LOMBARDY STREET  
RICHMOND, VA

**SURFACE ELEVATION:** 96.5 ±

**GROUNDWATER ELEVATION: DRY**

EQUIPMENT: HAND AUGER

SEA REPRESENTATIVE: DOMINIQUE SNYDER

DATE: 2-23-93

**TIME: 10:30 AM**

[illegible]

**SCHNABEL ENGINEERING ASSOCIATES, INC.**

# HAND AUGER LOG

**CONTRACT NO: 933083**

**HAND AUGER NO: HA-4**

**PROJECT: ESA UPDATE, REHRIG FACILITY**

**LOCATION:** 901 N. LOMBARDY STREET  
RICHMOND, VA

**SURFACE ELEVATION:** 95.8 ±

GROUNDWATER ELEVATION: DRY

EQUIPMENT: HAND AUGER

SEA REPRESENTATIVE: DOMINIQUE SNYDER

DATE: 2-23-93

**TIME: 11:05 AM**

DEPTH	ELEVATION	STRATUM	DESCRIPTION OF SOIL AND OBSERVATIONS	REMARKS
- 0.6 -1.0	95.0	A	CONCRETE SLAB	FILL
			VDOT NO. 57 STONE FILL, MOIST - GRAY	NO SAMPLE TAKEN DUE TO SECOND SLAB
- - - - - - - - - - -			HAND AUGER TERMINATED AT 1.0 FT DUE TO A SECOND CONCRETE SLAB	ELEVATION REFERENCED TO ELEVATED WALKWAY (ASSUMED EL 100)

**SCHNABEL ENGINEERING ASSOCIATES, INC.**

# HAND AUGER LOG

**CONTRACT NO: 933083**

**HAND AUGER NO: HA-5**

**PROJECT: ESA UPDATE, REHRIG FACILITY**

**LOCATION:** 901 N. LOMBARDY STREET  
RICHMOND, VA

**SURFACE ELEVATION:** 103.5 ±

**GROUNDWATER ELEVATION: DRY**

EQUIPMENT: HAND AUGER

SEA REPRESENTATIVE: DOMINIQUE SNYDER

**DATE: 2-23-93**

**TIME: 12:45 PM**

DEPTH	ELEVATION	STRATUM	DESCRIPTION OF SOIL AND OBSERVATIONS	REMARKS
-0.5 0.7 -1.0	103.0	A	CONCRETE SLAB	FILL
		B	LEAN CLAY (CL) WITH SAND, MOIST - RED BROWN FINE TO MEDIUM CLAYEY SAND (SC), MOIST - BROWN	SAMPLE TAKEN FROM 0.7 TO 1.0 FT
- - - - - - - - - -			HAND AUGER TERMINATED AT 1.0 FT	ELEVATION REFERENCED TO ELEVATED WALKWAY (ASSUMED EL 100)

**SCHNABEL ENGINEERING ASSOCIATES, INC.**

# HAND AUGER LOG

**CONTRACT NO: 933083**

**HAND AUGER NO: HA-6**

**PROJECT: ESA UPDATE, REHRIG FACILITY**

**LOCATION:** 901 N. LOMBARDY STREET  
RICHMOND, VA

**SURFACE ELEVATION:** 103.6 ±

**GROUNDWATER ELEVATION: DRY**

**EQUIPMENT:** HAND AUGER

SEA REPRESENTATIVE: DOMINIQUE SNYDER

**DATE: 2-23-93**

**TIME: 1:30 PM**

DEPTH	ELEVATION	STRATUM	DESCRIPTION OF SOIL AND OBSERVATIONS	REMARKS
-0.5	103.0	A	CONCRETE SLAB	FILL
- 1.2		B	FINE TO MEDIUM CLAYEY SAND (SC), MOIST - RED BROWN	SAMPLE TAKEN FROM 0.7 TO 1.2 FT
- - - - - - - - - -			HAND AUGER TERMINATED AT 1.2 FT	ELEVATION REFERENCED TO ELEVATED WALKWAY (ASSUMED EL 100)



## **APPENDIX B**

### **PROTOCOL FOR INSTALLING BORINGS AND HAND AUGER PROBES**

PROTOCOL FOR INSTALLING  
BORINGS/HAND AUGER PROBES

I. DRILLING METHODS AND PROCEDURE

Drilling and sampling was performed using a 2 1/4 inch I.D., hollow-stem auger drill and split-barrel (spoon) soil sampling device.

- A. Borehole locations were marked by Schnabel Environmental prior to mobilizing the drilling equipment. Authorization to drill at any specific location was made by the owner prior to drilling.
- B. All materials were decontaminated prior to their use. Hollow-stem augers were advanced in maximum increments of five feet below the ground surface where split-spoon soil samples were collected. The auger plug and sampler were removed and cleaned at each sampling interval.
- C. A standard steel split-spoon sampler was lowered through the auger stem and a soil sample was obtained using American Society of Testing and Materials (ASTM) procedures designated ASTM D-1586. The split-spoon soil samples were examined and described, and the visual sample classifications were recorded on a boring log. The Unified Soil Classification System, ASTM D-2487-83 with additional descriptive terms was used for visual sample classifications.

Duplicate samples were placed in a glass bottles immediately after sample recovery and labeled as to the date of boring, boring number, blow counts, sample number and sample depth. The samples were then placed in a cooler and kept on ice until delivery to the test laboratory. Delivery was made within 24 hours of sampling.

II. HAND AUGER METHODS AND PROCEDURE

Hand auger probes were performed using 2 1/2 inch bucket hand auger.

- A. Hand auger locations were marked by Schnabel Environmental prior to sampling. Authorization to perform hand auger probes at any specific location was made by the owner prior to sampling.
- B. The hand auger bucket was decontaminated prior to use. The hand auger was advanced in maximum measurements of one-half foot below the ground surface where samples were collected. The hand auger bucket was cleaned and decontaminated between hand auger locations.

- C. Visual classification and a description of each soil sample was recorded on a hand auger log. Each sample was placed in a jar immediately after recovery and labeled with the date of the probe, hand auger identification number, and sample depth. The samples were placed in a cooler and kept on ice until delivery to the testing laboratory. Delivery was made within 24 hours of sampling.

### III. QUALITY ASSURANCE/QUALITY CONTROL

#### Decontamination:

A strict quality assurance/quality control (QA/QC) procedure was followed for thorough decontamination of the materials prior to their use. The drill rig and drilling equipment, including auger flights, drill rods, plug, split-spoon sampler, tremie pipes, etc. were steam cleaned prior to moving onto the boring location. In addition, appropriate components of the drill rig were steam cleaned prior to the start of the job.

The decontamination procedure for split-spoon samplers and hand augers included either steam cleaning or a combination of a detergent scrub, tap water rinse, and a final deionized water rinse.

**APPENDIX C**

**LABORATORY CERTIFICATES OF ANALYSIS  
CHAIN OF CUSTODY**

**ROCOMPLIANCE**  
 LABORATORIES, INC.

ROUTE 4, BOX 286 A

BOX 286 A

(RT. 1 &amp; OLD KEETON RD.)

ETON RD.)

GLEN ALLEN, VA 23060

VA 23060

(804) 550-3971 FAX 550-3826

550-3826

### Certificate of Analysis

No. : 933083  
 Name : ESA Update, Rehrig Facility  
 Ordered By : Russell S. Harris, Jr.  
 Received: March 18, 1993  
 Issued: March 30, 1993

Test Method: SW-846

1 sample labeled HA-1 (3-3.5 ft.) was analyzed for the following metals:

B-2

	HA-1 (3-3.5 ft.)	DL
mg/kg	3.9	3.5
mg/kg	13.5	6.0

Test Method: MCAWW Method 150.1

1 sample labeled HA-1 (3-3.5 ft.) was analyzed for pH.

	HA-1 (3-3.5 ft.)
pH	4.61

the

Test Method: MCAWW Method 375.1

1 sample labeled HA-1 (3-3.5 ft.) was analyzed for Sulfate.

	HA-1 (3-3.5 ft.)
mg/kg	9.7
mg/kg	5.0

Below Detection Limit

*La Tombes*  
 La Tombes  
 Laboratory Manager

40R

**ENVIROCOMPLIANCE**  
LABORATORIES, INC.

ROUTE 4, BOX 286 A

(RT. 1 &amp; OLD KEETON RD.)

GLEN ALLEN, VA 23060

(804) 550-3971 FAX 550-3826

Certificate of Analysis

Project No. : V933083  
Project Name : ESA Update, Rehrig International  
Submitted By : Russell S. Harris, Jr.  
Date Received: February 23, 1993  
Date Reissued: April 2, 1993

Reference Method: SW-846 Method 9045

Four soil samples labeled HA-2, HA-3, HA-5, and HA-6 were analyzed for pH:

<u>Sample ID</u>	<u>pH</u>
HA-2	6.50
HA-3	9.05
HA-5	8.29
HA-6	7.58


Reference Method: SW-846 Method 7521

Four soil samples labeled HA-2, HA-3, HA-5, and HA-6 were analyzed Total Nickel.

<u>Sample ID</u>	<u>Total Nickel</u> <u>mg/kg</u>
HA-2	7.0
HA-3	18.2
HA-5	24.4
HA-6	66.5

Detection Limit 3.5

BDL = Below Detection Limit

  
Carmela Tombes  
Laboratory Manager

93023297R

**ENVIROCOMPLIANCE**  
LABORATORIES, INC.

ROUTE 4, BOX 286 A

(RT. 1 &amp; OLD KEETON RD.)

GLEN ALLEN, VA 23060

(804) 550-3971 FAX 550-3826

Certificate of Analysis

Project No. : V933083  
Project Name : ESA Update, Rehrig International  
Submitted By : Russell S. Harris, Jr.  
Date Received: February 23, 1993  
Date Reissued: April 2, 1993

Reference Method: SW-846

Four soil samples labeled HA-2, HA-3, HA-5, and HA-6 were analyzed TCLP Nickel and Chromium by TCLP Extraction Method 1311.

<u>Sample ID</u>	<u>TCLP Nickel</u> <u>mg/l</u>	<u>TCLP Chromium</u> <u>mg/l</u>
HA-2	BDL	BDL
HA-3	BDL	BDL
HA-5	BDL	BDL
HA-6	BDL	BDL
Detection Limit	0.14	0.5

Reference Method: MCAWW Method 375.4

Four soil samples labeled HA-2, HA-3, HA-5, and HA-6 were analyzed for Sulfates.

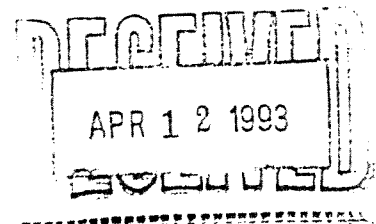
<u>Sample ID</u>	<u>Sulfates</u> <u>mg/kg</u>
HA-2	115.4
HA-3	84.6
HA-5	130.8
HA-6	169.2
Detection Limit	5.0

BDL = Below Detection Limit



Carmela Tombes  
Laboratory Manager

93023297R



viroCompliance Laboratories, Inc.  
Maple Leaf Court (804)550-3971  
Inland, Virginia 23005

Client : Schmidt Environmental Services  
Submit to : Russell S. Harris, Jr.

Page \_\_\_\_\_ of \_\_\_\_\_

[illegible]

W=Water S=Soil O=Organic Aq=Aqueous Sl=Sludge F=Filter H=Misc.



=Water S=Soil O=Organic Aq=Aqueous Sl=Sludge F=Filter H=Misc.



LABORATORIES, INC.  
Schnabel Environmental Svcs.  
Attn: Russ Harris  
1 West Cary Street  
Richmond, VA 23220

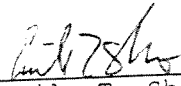
10357 Old Keeton Road  
Glen Allen, Virginia 23059  
Phone 804 • 550 • 3971  
Fax 804 • 550 • 3826

## Certificate of Analysis

Project Name : Rehrig Facility  
Date Received: December 01, 1999  
Date Sampled : December 01, 1999  
Time Sampled : 10:52  
Date Issued : December 08, 1999

Lab #	Sample ID	Location	Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
1	#1	Tool & Die Shop, 2 Gas Bottles in Area (Stored)	TPH	BDL	mg/kg	25.0	12-07/1526	12-08/1006	418.1	AEM
2	#2	Tool & Die Shop, 2 Gas Bottles in Area (Stored)	TPH	BDL	mg/kg	25.0	12-07/1526	12-08/1006	418.1	AEM
3	#3	Between Machine Shop and Tool & Die Shop	TPH	BDL	mg/kg	25.0	12-07/1526	12-08/1006	418.1	AEM

BDL = Below Detection Limit

  
Emile T. Shaw  
Laboratory Manager

R9C31581-1/5

ENVIRONMENTAL COMPLIANCE



LABORATORIES, INC.  
Schnabel Environmental Svcs.  
Attn: Russ Harris  
1 West Cary Street  
Richmond, VA 23220

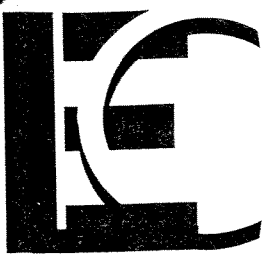
10357 Old Keeton Road  
Glen Allen, Virginia 23059  
Phone 804 • 550 • 3971  
Fax 804 • 550 • 3826

# Certificate of Analysis

Project Name : Rehrig Facility  
Date Received: December 01, 1999  
Date Sampled : December 01, 1999  
Time Sampled : 11:55  
Date Issued : December 08, 1999

Lab #	6/Sample ID	Tool Wash	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
			BDL	ug/kg	20.0	12-06/1128	12-06/1207	8260B	KOD
Parameter			BDL	ug/kg	20.0	12-06/1128	12-06/1207	8260B	KOD
Chloromethane			BDL	ug/kg	20.0	12-06/1128	12-06/1207	8260B	KOD
Bromomethane			BDL	ug/kg	20.0	12-06/1128	12-06/1207	8260B	KOD
Vinyl chloride			BDL	ug/kg	20.0	12-06/1128	12-06/1207	8260B	KOD
Dichlorodifluoromethane			BDL	ug/kg	20.0	12-06/1128	12-06/1207	8260B	KOD
Chloroethane			BDL	ug/kg	20.0	12-06/1128	12-06/1207	8260B	KOD
Methylene chloride			BDL	ug/kg	50.0	12-06/1128	12-06/1207	8260B	KOD
Acetone			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Carbon disulfide			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Trichlorofluoromethane			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,1-Dichloroethene			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Bromochloromethane			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,1-Dichloroethane			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
c-1,2-Dichloroethene			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
t-1,2-Dichloroethene			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Chloroform			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
2,2-Dichloropropane			BDL	ug/kg	50.0	12-06/1128	12-06/1207	8260B	KOD
1,1,1-Trichloroethane			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
2-Butanone (MEK)			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,2-Dichloroethane			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Dibromomethane			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Carbon tetrachloride			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Bromodichloromethane			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,2-Dichloropropane			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,3-Dichloropropane			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Trichloroethene			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Benzene			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Dibromochloromethane			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
c-1,3-Dichloropropene			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
t-1,3-Dichloropropene			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,1,2-Trichloroethane			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,2-Dibromoethane			BDL	ug/kg	50.0	12-06/1128	12-06/1207	8260B	KOD
Toluene			BDL	ug/kg	50.0	12-06/1128	12-06/1207	8260B	KOD
4-Methyl-2-pentanone			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
2-Hexanone			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Bromoform			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,1,1,2-Tetrachloroethane			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,1-Dichloropropene			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Tetrachloroethene			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Chlorobenzene			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Ethylbenzene			BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
Styrene			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Xylenes (total)			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,2,3-Trichloropropane			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,1,2,2-Tetrachloroethane			BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Bromobenzene			BDL	ug/kg					
Isopropylbenzene									
BDL = Below Detection Limit									

*Emile T. Shaw*  
Emile T. Shaw  
Laboratory Manager  
99C31581-4/5



LABORATORIES, INC.  
Schnabel Environmental Svcs.  
Attn: Russ Harris  
1 West Cary Street  
Richmond, VA 23220

10357 Old Keeton Road  
Glen Allen, Virginia 23059  
Phone 804 • 550 • 3971  
Fax 804 • 550 • 3826

# Certificate of Analysis

Project Name : Rehrig Facility  
Date Received: December 01, 1999  
Date Sampled : December 01, 1999  
Time Sampled : 11:55  
Date Issued : December 08, 1999

Lab # 6/Sample ID : #3 Tool Wash

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
t-Butylbenzene	BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
n-Propylbenzene	BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Hexachlorobutadiene	BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
2-Chlorotoluene	BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
4-Chlorotoluene	BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
s-Butylbenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
1,3-Dichlorobenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
1,2-Dichlorobenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
1,4-Dichlorobenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
4-Isopropyltoluene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
n-Butylbenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
1,3,5-Trimethylbenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
1,2,4-Trimethylbenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
1,2,4-Trichlorobenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
1,2,3-Trichlorobenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
Naphthalene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD

Lab # 7/Sample ID : #6 Bending Machine & Resistance Spot Welders

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
TPH	BDL	mg/kg	25.0	12-07/1526	12-08/1006	418.1	AEM

Lab # 8/Sample ID : #7 Dumpster Area

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
TPH	BDL	mg/kg	25.0	12-07/1526	12-08/1006	418.1	AEM

Lab # 9/Sample ID : #8 Gas Bottles

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
TPH	28.7	mg/kg	25.0	12-07/1526	12-08/1006	418.1	AEM

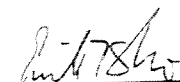
Lab # 10/Sample ID : #9 Dumpster Area

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
TPH	BDL	mg/kg	25.0	12-07/1526	12-08/1006	418.1	AEM

Lab # 11/Sample ID : #10 Dumpster Area

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Nickel	BDL	mg/kg	12.50	12-02/0948	12-06/1618	7520	CMG
Chromium	10.03	mg/kg	6.25	12-02/0948	12-06/1452	7190	CMG

BDL = Below Detection Limit

  
Emile T. Shaw  
Laboratory Manager

R9C31581-5/5

ENVIRONMENTAL COMPLIANCE



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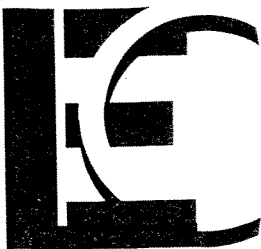
# Certificate of Analysis

Project Name : Rehrig Facility  
Date Received : December 01, 1999  
Date Sampled : December 01, 1999  
Time Sampled : 11:30  
Date Issued : December 08, 1999

Lab # 4/Sample ID : #4		Tool Cleanup Station		Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Parameter				BDL	ug/kg	20.0	12-06/1128	12-06/1207	8260B	KOD
Chloromethane				BDL	ug/kg	20.0	12-06/1128	12-06/1207	8260B	KOD
Bromomethane				BDL	ug/kg	20.0	12-06/1128	12-06/1207	8260B	KOD
Vinyl chloride				BDL	ug/kg	20.0	12-06/1128	12-06/1207	8260B	KOD
Dichlorodifluoromethane				BDL	ug/kg	20.0	12-06/1128	12-06/1207	8260B	KOD
Chloroethane				BDL	ug/kg	20.0	12-06/1128	12-06/1207	8260B	KOD
Methylene chloride				BDL	ug/kg	50.0	12-06/1128	12-06/1207	8260B	KOD
Acetone				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Carbon disulfide				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Trichlorofluoromethane				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,1-Dichloroethene				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Bromochloromethane				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,1-Dichloroethane				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
c-1,2-Dichloroethene				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
t-1,2-Dichloroethene				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Chloroform				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
2,2-Dichloropropane				BDL	ug/kg	50.0	12-06/1128	12-06/1207	8260B	KOD
1,1,1-Trichloroethane				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
2-Butanone (MEK)				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,2-Dichloroethane				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Dibromomethane				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Carbon tetrachloride				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Bromodichloromethane				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,2-Dichloropropane				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,3-Dichloropropane				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Trichloroethene				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Benzene				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Dibromochloromethane				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
c-1,3-Dichloropropene				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
t-1,3-Dichloropropene				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,1,2-Trichloroethane				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,2-Dibromoethane				BDL	ug/kg	50.0	12-06/1128	12-06/1207	8260B	KOD
Toluene				BDL	ug/kg	50.0	12-06/1128	12-06/1207	8260B	KOD
4-Methyl-2-pentanone				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
2-Hexanone				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Bromoform				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,1,1,2-Tetrachloroethane				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,1-Dichloropropene				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Tetrachloroethene				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Chlorobenzene				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Ethylbenzene				BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
Styrene				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Xylenes (total)				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,2,3-Trichloropropane				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
1,1,2,2-Tetrachloroethane				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Bromobenzene				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Isopropylbenzene				BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD

BDL = Below Detection Limit

*Emile T. Shaw*  
Emile T. Shaw  
Laboratory Manager  
R9C31581-2/5



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# Certificate of Analysis

Project Name : Rehrig Facility  
Date Received: December 01, 1999  
Date Sampled : December 01, 1999  
Time Sampled : 11:30  
Date Issued : December 08, 1999

Lab # 4/Sample ID : <sup>44</sup> Tool Cleanup Station

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
t-Butylbenzene	BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
n-Propylbenzene	BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
Hexachlorobutadiene	BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
2-Chlorotoluene	BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
4-Chlorotoluene	BDL	ug/kg	5.0	12-06/1128	12-06/1207	8260B	KOD
s-Butylbenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
1,3-Dichlorobenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
1,2-Dichlorobenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
1,4-Dichlorobenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
4-Isopropyltoluene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
n-Butylbenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
1,3,5-Trimethylbenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
1,2,4-Trimethylbenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
1,2,4-Trichlorobenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
1,2,3-Trichlorobenzene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD
Naphthalene	BDL	ug/kg	10.0	12-06/1128	12-06/1207	8260B	KOD

Lab # 5/Sample ID : <sup>45</sup> Wire Storage

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
TPH	BDL	mg/kg	25.0	12-07/1526	12-08/1006	418.1	AEM

BDL = Below Detection Limit

Emile T. Shaw  
Laboratory Manager

R9C31581-3/5



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# Certificate of Analysis


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Project No. : 993619  
Project Name : Rehrig Facility  
Date Received: December 06, 1999  
Date Sampled : December 02, 1999  
Time Sampled : 11:35  
Date Issued : December 14, 1999

Lab # 2/Sample ID : <sup>#1A</sup> Tool Cleaning Station

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Chloromethane	BDL	ug/kg	20.0	12-13/1056	12-13/1056	8260B	KOD
Bromomethane	BDL	ug/kg	20.0	12-13/1056	12-13/1056	8260B	KOD
Vinyl chloride	BDL	ug/kg	20.0	12-13/1056	12-13/1056	8260B	KOD
Dichlorodifluoromethane	BDL	ug/kg	20.0	12-13/1056	12-13/1056	8260B	KOD
Chloroethane	BDL	ug/kg	20.0	12-13/1056	12-13/1056	8260B	KOD
Methylene chloride	BDL	ug/kg	20.0	12-13/1056	12-13/1056	8260B	KOD
Acetone	BDL	ug/kg	50.0	12-13/1056	12-13/1056	8260B	KOD
Carbon disulfide	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
Trichlorofluoromethane	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
1,1-Dichloroethene	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
Bromochloromethane	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
1,1-Dichloroethane	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
c-1,2-Dichloroethene	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
t-1,2-Dichloroethene	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
Chloroform	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
2,2-Dichloropropane	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
1,1,1-Trichloroethane	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
2-Butanone (MEK)	BDL	ug/kg	50.0	12-13/1056	12-13/1056	8260B	KOD
1,2-Dichloroethane	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
Dibromomethane	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
Carbon tetrachloride	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
Bromodichloromethane	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
1,2-Dichloropropane	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
1,3-Dichloropropane	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
Trichloroethene (TCE)	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
Benzene	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
Dibromochloromethane	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
c-1,3-Dichloropropene	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
t-1,3-Dichloropropene	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD
1,1,2-Trichloroethane	BDL	ug/kg	5.0	12-13/1056	12-13/1056	8260B	KOD

BDL = Below Detection Limit

  
Emile T. Shaw  
Laboratory Manager  
R9C31646-1/7

ENVIRO COMPLIANCE



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# Certificate of Analysis

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Project No. : 993619  
Project Name : Rehrig Facility  
Date Received: December 06, 1999  
Date Sampled : December 02, 1999  
Time Sampled : 11:47  
Date Issued : December 14, 1999

Lab # 2/Sample ID		#14 : Cool Cleaning Station			Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Parameter	Result	Units	DL					
1,2-Dibromoethane	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
Toluene	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
4-Methyl-2-pentanone	BDL	ug/kg	50.0		12-13/1056	12-13/1056	8260B	KOD
2-Hexanone	BDL	ug/kg	50.0		12-13/1056	12-13/1056	8260B	KOD
Bromoform	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
1,1,1,2-Tetrachloroethane	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
1,1-Dichloropropene	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
Tetrachloroethene (PCE)	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
Chlorobenzene	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
Ethylbenzene	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
Styrene	BDL	ug/kg	10.0		12-13/1056	12-13/1056	8260B	KOD
Xylenes (total)	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
1,2,3-Trichloropropane	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
1,1,2,2-Tetrachloroethane	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
Bromobenzene	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
Isopropylbenzene	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
t-Butylbenzene	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
n-Propylbenzene	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
Hexachlorobutadiene	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
2-Chlorotoluene	BDL	ug/kg	5.0		12-13/1056	12-13/1056	8260B	KOD
4-Chlorotoluene	BDL	ug/kg	10.0		12-13/1056	12-13/1056	8260B	KOD
s-Butylbenzene	BDL	ug/kg	10.0		12-13/1056	12-13/1056	8260B	KOD
1,3-Dichlorobenzene	BDL	ug/kg	10.0		12-13/1056	12-13/1056	8260B	KOD
1,2-Dichlorobenzene	BDL	ug/kg	10.0		12-13/1056	12-13/1056	8260B	KOD
1,4-Dichlorobenzene	BDL	ug/kg	10.0		12-13/1056	12-13/1056	8260B	KOD
4-Isopropyltoluene	BDL	ug/kg	10.0		12-13/1056	12-13/1056	8260B	KOD
n-Butylbenzene	BDL	ug/kg	10.0		12-13/1056	12-13/1056	8260B	KOD
1,3,5-Trimethylbenzene	BDL	ug/kg	10.0		12-13/1056	12-13/1056	8260B	KOD
1,2,4-Trimethylbenzene	BDL	ug/kg	10.0		12-13/1056	12-13/1056	8260B	KOD
1,2,4-Trichlorobenzene	BDL	ug/kg	10.0		12-13/1056	12-13/1056	8260B	KOD

BDL = Below Detection Limit

*Emile T. Shaw*  
Emile T. Shaw  
Laboratory Manager  
R9C31646-2/7





# Certificate of Analysis

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LABORATORIES, INC.  
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Project No. : 993619  
Project Name : Rehrig Facility  
Date Received: December 06, 1999  
Date Sampled : December 02, 1999  
Time Sampled : 11:47  
Date Issued : December 14, 1999

Lab # 2/Sample ID : <sup>#14</sup> Cool Cleaning Station

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
1,2,3-Trichlorobenzene	BDL	ug/kg	10.0	12-13/1056	12-13/1056	8260B	KOD
Naphthalene	BDL	ug/kg	10.0	12-13/1056	12-13/1056	8260B	KOD

Lab # 3/Sample ID : <sup>#18</sup> Chemical Storage for Plating

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Nickel	BDL	mg/kg	12.50	12-09/1500	12-10/1115	7520	CMG
Chromium	7.24	mg/kg	6.25	12-09/1500	12-10/1230	7190	ETS
Reactivity	Negative	mg/kg	--	12-07/1300	12-13/1430	7.3	RLO
Cyanide	BDL	mg/kg	25	12-07/1300	12-09/1625	7.3/9010	RLO
Sulfide	406	mg/kg	50	12-13/1430	12-13/1430	7.3/9030	MLC
Ignitability	>60	°C	--	12-13/1500	12-13/1700	1010	ETS
Corrosivity	Negative		--	12-14/1600	12-14/1600	7.2	ISW
pH	5.4	SU	--	12-14/1600	12-14/1600	9040	ISW


Lab # 4/Sample ID : <sup>#17</sup> Solid Haz-Waste Storage

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Nickel	BDL	mg/kg	12.50	12-09/1500	12-10/1115	7520	CMG
Chromium	9.46	mg/kg	6.25	12-09/1500	12-10/1230	7190	ETS
Reactivity	Negative	mg/kg	--	12-07/1300	12-13/1430	7.3	RLO
Cyanide	BDL	mg/kg	25	12-07/1300	12-09/1625	7.3/9010	RLO
Sulfide	406	mg/kg	50	12-13/1430	12-13/1430	7.3/9030	MLC
Ignitability	>60	°C	--	12-13/1500	12-13/1700	1010	ETS
Corrosivity	Negative		--	12-14/1600	12-14/1600	7.2	ISW
pH	6.5	SU	--	12-14/1600	12-14/1600	9040	ISW

Lab # 5/Sample ID : <sup>#15</sup> Molding Machines

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
TPH	10559.6	mg/kg	25.0	12-07/1526	12-08/1006	418.1	AEH

BDL = Below Detection Limit

  
Emile T. Shaw  
Laboratory Manager  
R9C31646-3/7



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# Certificate of Analysis

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Project No. : 993619  
Project Name : Rehrig Facility  
Date Received: December 06, 1999  
Date Sampled : December 02, 1999  
Time Sampled : 12:25  
Date Issued : December 14, 1999

#22  
Lab # 7/Sample ID : Acid Storage Area for Tank

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Nickel	661.51	mg/kg	12.50	12-09/1500	12-10/1115	7520	CMG
Chromium	45.47	mg/kg	6.25	12-09/1500	12-10/1230	7190	ETS
Reactivity	Negative	mg/kg	--	12-07/1300	12-13/1430	7.3	RLO
Cyanide	BDL	mg/kg	25	12-07/1300	12-09/1625	7.3/9010	RLO
Sulfide	430	mg/kg	50	12-13/1430	12-13/1430	7.3/9030	MLC
Ignitability	>60	°C	--	12-13/1500	12-13/1700	1010	ETS
Corrosivity	Negative		--	12-14/1600	12-14/1600	7.2	ISW
pH	6.2	SU	--	12-14/1600	12-14/1600	9040	ISW

#20  
Lab # 8/Sample ID : Liquid Treatment System Filter Press

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Nickel	936.29	mg/kg	12.50	12-09/1500	12-10/1115	7520	CMG
Chromium	521.90	mg/kg	6.25	12-09/1500	12-10/1230	7190	ETS
Reactivity	Negative	mg/kg	--	12-07/1300	12-13/1430	7.3	RLO
Cyanide	BDL	mg/kg	25	12-07/1300	12-09/1625	7.3/9010	RLO
Sulfide	335	mg/kg	50	12-13/1430	12-13/1430	7.3/9030	MLC
Ignitability	>60	°C	--	12-13/1500	12-13/1700	1010	ETS
Corrosivity	Negative		--	12-14/1600	12-14/1600	7.2	ISW
pH	6.0	SU	--	12-14/1600	12-14/1600	9040	ISW
TCLP Chromium	BDL	mg/l	.5	12-14/1000	12-14/1540	1311/7190	CMG

#19  
Lab # 9/Sample ID : Old Plating Line

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Nickel	BDL	mg/kg	12.50	12-09/1500	12-10/1115	7520	CMG
Chromium	59.32	mg/kg	6.25	12-09/1500	12-10/1230	7190	ETS
Reactivity	Negative	mg/kg	--	12-07/1300	12-13/1430	7.3	RLO
Cyanide	BDL	mg/kg	25	12-07/1300	12-09/1625	7.3/9010	RLO
Sulfide	311	mg/kg	50	12-13/1430	12-13/1430	7.3/9030	MLC
Ignitability	>60	°C	--	12-13/1500	12-13/1700	1010	ETS

BDL = Below Detection Limit

Emile T. Shaw  
Laboratory Manager  
R9C31646-4/7



LABORATORIES, INC.

Schnabel Environmental Svcs.

Attn: Russ Harris

1 West Cary Street

Richmond, VA 23220

# Certificate of Analysis

10357 Old Keeton Road  
Glen Allen, Virginia 23059  
Phone 804 • 550 • 3971  
Fax 804 • 550 • 3826

Project No. : 993619  
Project Name : Rehrig Facility  
Date Received: December 06, 1999  
Date Sampled : December 02, 1999  
Time Sampled : 12:25  
Date Issued : December 14, 1999

Lab # 9/Sample ID : <sup>#19</sup> Old Plating Line

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Corrosivity	Negative		--	12-14/1600	12-14/1600	7.2	ISW
pH	10.1	SU	--	12-14/1600	12-14/1600	9040	ISW

Lab # 10/Sample ID : <sup>#21</sup> Maint. Storage

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Nickel	BDL	mg/kg	12.50	12-09/1500	12-10/1115	7520	CMG
Chromium	BDL	mg/kg	6.25	12-09/1500	12-10/1230	7190	ETS
Reactivity	Negative	mg/kg	--	12-07/1300	12-13/1430	7.3	RLO
Cyanide	BDL	mg/kg	25	12-07/1300	12-09/1625	7.3/9010	RLO
Sulfide	430	mg/kg	50	12-13/1430	12-13/1430	7.3/9030	MLC
Ignitability	>60	°C	--	12-13/1500	12-13/1700	1010	ETS
Corrosivity	Negative		--	12-14/1600	12-14/1600	7.2	ISW
pH	8.1	SU	--	12-14/1600	12-14/1600	9040	ISW

Lab # 11/Sample ID : <sup>#23</sup> Parts Storage (Assembly)

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
TPH	BDL	mg/kg	25.0	12-07/1526	12-08/1006	418.1	AEM

Lab # 12/Sample ID : <sup>#24</sup> Parts Storage

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
TPH	BDL	mg/kg	25.0	12-07/1526	12-08/1006	418.1	AEM

Lab # 13/Sample ID : <sup>#25</sup> Wheel ReVetting

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
TPH	BDL	mg/kg	25.0	12-07/1526	12-08/1006	418.1	AEM

Lab # 14/Sample ID : <sup>#26</sup> Air/Electic Tools

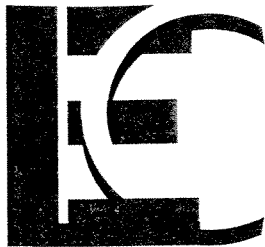
Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
TPH	BDL	mg/kg	25.0	12-07/1526	12-08/1006	418.1	AEM

BDL = Below Detection Limit

Emile T. Shaw

Laboratory Manager

R9C31646-5/7



LABORATORIES, INC.

Schnabel Environmental Svcs.  
Attn: Russ Harris  
1 West Cary Street  
Richmond, VA 23220

# Certificate of Analysis

10357 Old Keeton Road  
Glen Allen, Virginia 23059  
Phone 804 • 550 • 3971  
Fax 804 • 550 • 3826

Project Name : Rehrig Facility  
Date Received: December 02, 1999  
Date Sampled : December 02, 1999  
Time Sampled : 08:45  
Date Issued : December 06, 1999

Lab # 1/Sample ID : <sup>#27</sup> Pit - New Plating Line 27

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Nickel	349.46	mg/kg	12.50	12-03/1420	12-06/1618	7520	CMG
Chromium	BDL	mg/kg	6.25	12-03/1420	12-06/1452	7190	CMG
TCLP Chromium	BDL	mg/l	.25	12-02/1210	12-06/1452	1311/7190	CMG

Lab # 2/Sample ID : <sup>#28</sup> Pit - New Plating Line 28

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Nickel	2285.11	mg/kg	12.50	12-03/1420	12-06/1618	7520	CMG
Chromium	91.42	mg/kg	6.25	12-02/1210	12-06/1452	7190	CMG
TCLP Chromium	0.30	mg/l	.25	12-02/1210	12-06/1452	1311/7190	CMG

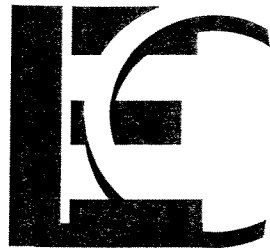
Lab # 3/Sample ID : <sup>#29</sup> Pit - New Plating Line 29

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Nickel	14.81	mg/kg	12.50	12-03/1420	12-06/1618	7520	CMG
Chromium	BDL	mg/kg	6.25	12-03/1420	12-06/1452	7190	CMG
TCLP Chromium	BDL	mg/l	.25	12-02/1210	12-06/1452	1311/7190	CMG

BDL = Below Detection Limit

Emile T. Shaw  
Laboratory Manager

R9C31586-1



LABORATORIES, INC.

Schnabel Environmental Svcs.

Attn: Russ Harris

1 West Cary Street

Richmond, VA 23220

# Certificate of Analysis

10357 Old Keeton Road  
Glen Allen, Virginia 23059  
Phone 804 • 550 • 3971  
Fax 804 • 550 • 3826

Project No. : 993619  
Project Name : Rehrig Facility  
Date Received: December 06, 1999  
Date Sampled : December 02, 1999  
Time Sampled : 08:45  
Date Issued : December 14, 1999

Lab # 1/Sample ID : Pit - New Plating Line 27

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Reactivity	Negative	mg/kg	--	12-07/1130	12-13/1430	7.3	RLO
Cyanide	BDL	mg/kg	25	12-07/1130	12-09/1210	7.3/9010	RLO
Sulfide	BDL	mg/kg	50	12-13/1430	12-13/1430	7.3/9030	MLC
Ignitability	>60	°C	--	12-10/0930	12-10/1630	1010	YPH
Corrosivity	Negative		--	12-14/1600	12-14/1600	7.2	ISW
pH	7.5	SU	--	12-14/1600	12-14/1600	9040	ISW

Lab # 2/Sample ID : Pit - New Plating Line 28

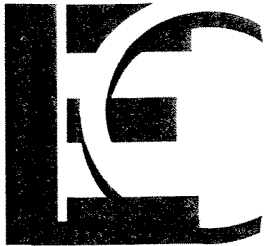
Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Reactivity	Negative	mg/kg	--	12-07/1130	12-13/1430	7.3	RLO
Cyanide	BDL	mg/kg	25	12-07/1130	12-09/1210	7.3/9010	RLO
Sulfide	BDL	mg/kg	50	12-13/1430	12-13/1430	7.3/9030	MLC
Ignitability	>60	°C	--	12-10/0930	12-10/1630	1010	YPH
Corrosivity	Negative		--	12-14/1600	12-14/1600	7.2	ISW
pH	9.2	SU	--	12-14/1600	12-14/1600	9040	ISW

Lab # 3/Sample ID : Pit - New Plating Line 29

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Reactivity	Negative	mg/kg	--	12-07/1130	12-13/1430	7.3	RLO
Cyanide	BDL	mg/kg	25	12-07/1130	12-09/1210	7.3/9010	RLO
Sulfide	335	mg/kg	50	12-13/1430	12-13/1430	7.3/9030	MLC
Ignitability	>60	°C	--	12-10/0930	12-10/1630	1010	YPH
Corrosivity	Negative		--	12-14/1600	12-14/1600	7.2	ISW
pH	9.6	SU	--	12-14/1600	12-14/1600	9040	ISW

BDL = Below Detection Limit

Emile T. Shaw  
Laboratory Manager



LABORATORIES, INC.  
Schnabel Environmental Svcs.  
Attn: Russ Harris  
1 West Cary Street  
Richmond, VA 23220

# Certificate of Analysis

10357 Old Keeton Road  
Glen Allen, Virginia 23059  
Phone 804 • 550 • 3971  
Fax 804 • 550 • 3826

Project No. : 993619  
Project Name : Rehrig Facility  
Date Received: December 06, 1999  
Date Sampled : December 02, 1999  
Time Sampled : 14:31  
Date Issued : December 14, 1999

Lab # 15/Sample ID : <sup>#31</sup> Chemical Storage

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Nickel	BDL	mg/kg	12.50	12-09/1500	12-10/1115	7520	CMG
Chromium	BDL	mg/kg	6.25	12-09/1500	12-10/1230	7190	ETS
Reactivity	Negative	mg/kg	--	12-07/1300	12-13/1430	7.3	RLO
Cyanide	BDL	mg/kg	25	12-07/1300	12-09/1625	7.3/9010	RLO
Sulfide	406	mg/kg	50	12-13/1430	12-13/1430	7.3/9030	MLC
Ignitability	>60	°C	--	12-13/1500	12-13/1700	1010	ETS
Corrosivity	Negative		--	12-14/1600	12-14/1600	7.2	ISW
pH	9.2	SU	--	12-14/1600	12-14/1600	9040	ISW

Lab # 16/Sample ID : <sup>#30</sup> Chemical Storage

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Nickel	BDL	mg/kg	12.50	12-09/1500	12-10/1115	7520	CMG
Chromium	12.23	mg/kg	6.25	12-09/1500	12-10/1230	7190	ETS
Reactivity	Negative	mg/kg	--	12-07/1300	12-13/1430	7.3	RLO
Cyanide	BDL	mg/kg	25	12-07/1300	12-09/1625	7.3/9010	RLO
Sulfide	383	mg/kg	50	12-13/1430	12-13/1430	7.3/9030	MLC
Ignitability	>60	°C	--	12-13/1500	12-13/1700	1010	ETS
Corrosivity	Negative		--	12-14/1600	12-14/1600	7.2	ISW
pH	9.6	SU	--	12-14/1600	12-14/1600	9040	ISW

Lab # 17/Sample ID : <sup>#33</sup> Parking Lot Near Warehouse

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Semi-volatiles	BDL	mg/kg	5.0	12-08/0900	12-08/1600	8015B	MDP
Volatiles	BDL	mg/kg	.5	12-08/0830	12-08/1815	8015B	BRG

Lab # 18/Sample ID : <sup>#34</sup> Parking Lot Near Visiting Parking Area

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Semi-volatiles	BDL	mg/kg	5.0	12-08/0900	12-08/1600	8015B	MDP

BDL = Below Detection Limit

Emile T. Shaw  
Laboratory Manager  
R9C31646-6/7



LABORATORIES, INC.

Schnabel Environmental Svcs.

Attn: Russ Harris

1 West Cary Street

Richmond, VA 23220

# Certificate of Analysis

10357 Old Keeton Road

Glen Allen, Virginia 23059

Phone 804 • 550 • 3971

Fax 804 • 550 • 3826

Project No. : 993619

Project Name : Rehrig Facility

Date Received: December 06, 1999

Date Sampled : December 02, 1999

Time Sampled : 15:23

Date Issued : December 14, 1999

Lab # 18/Sample ID : <sup>#34</sup> Parking Lot Near Visiting Parking Area

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Volatiles	BDL	mg/kg	.5	12-08/0830	12-08/1815	8015B	BRG

Lab # 19/Sample ID : <sup>#35</sup> Parking Lot Near Rear

Parameter	Result	Units	DL	Date/Time Prepared	Date/Time Analyzed	Method	Analyst
Semi-volatiles	31.5	mg/kg	5.0	12-08/0900	12-08/1600	8015B	MDP
Volatiles	BDL	mg/kg	.5	12-08/0830	12-08/1815	8015B	BRG

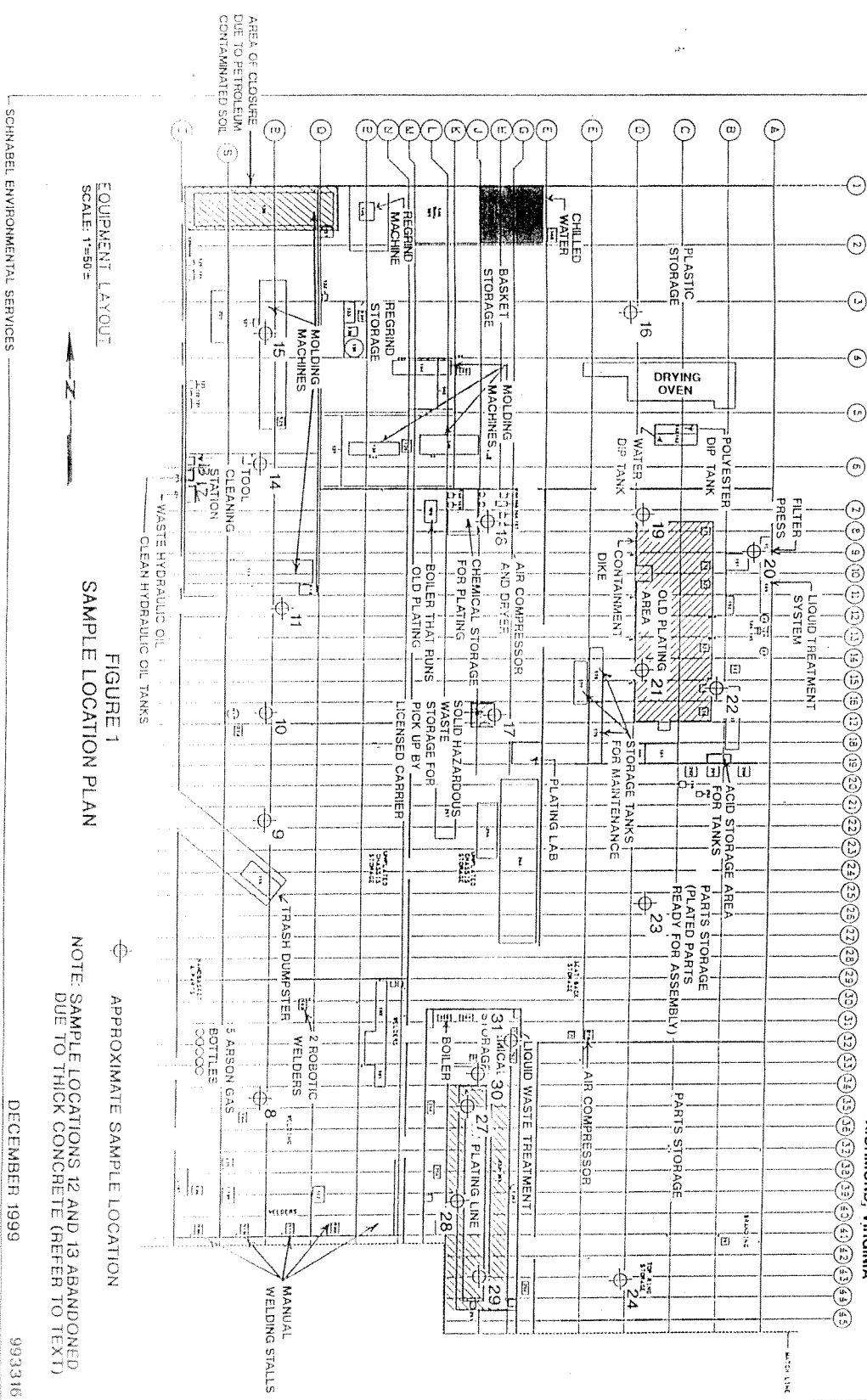
BDL = Below Detection Limit

Emile T. Shaw

Laboratory Manager

R9C31646-7/7

ENVIRONMENTAL SITE ASSESSMENT UPDATE  
 REHRIG FACILITY  
 901 N LOMBARDY STREET  
 RICHMOND, VIRGINIA



EQUIPMENT LAYOUT  
 SCALE: 1"=50'

FIGURE 1  
 SAMPLE LOCATION PLAN

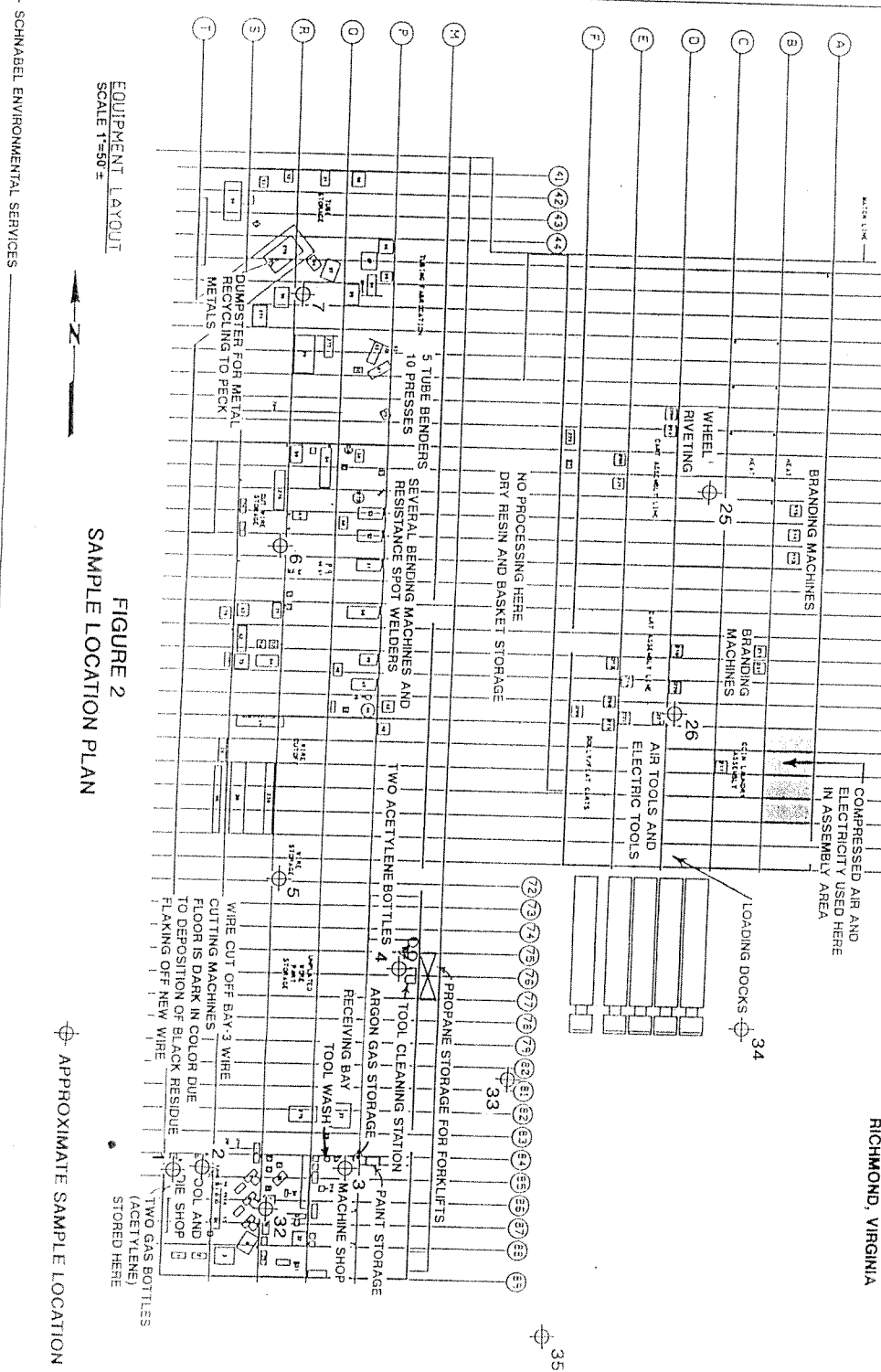
NOTE: SAMPLE LOCATIONS 12 AND 13 ABANDONED DUE TO THICK CONCRETE (REFER TO TEXT)

DECEMBER 1999

993316



ENVIRONMENTAL SITE ASSESSMENT UPDATE  
 REHRIG FACILITY  
 901 N LOMBARD STREET  
 RICHMOND, VIRGINIA



**MAY 21, 1993**

**LETTER FROM VIRGINIA DEPARTMENT OF WASTE MANAGEMENT TO  
REHRIG INTERNATIONAL**



Sherr  
TSD  
GEN

# COMMONWEALTH of VIRGINIA

RICHARD N. BURTON  
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

(804) 225-2667  
TDD (804) 371-8737

MAY 21 1993

Mr. Paul Bauz  
Plating Manager  
Rehrig International  
901 N. Lombardy Street  
Richmond, Virginia 23220

RE: RCRA Compliance Inspection  
EPA ID# VAD089028377

Dear Mr. Bauz:

During a recent (May 13, 1993) inspection, it was noted that your facility was not in total compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). Such instances are indicated by check marks on the enclosed inspection checklists and are listed below:

1. There is insufficient aisle space in the less than 90-day accumulation area as required by VHWMR §9.2.E.
2. Hazardous waste accumulation areas have been established without prior notification of the Director as required by VHWMR §6.4.E.1.e.
3. The Contingency Plan needs to be updated to reflect the changes in accumulation areas, to include a new alternate coordinator, and to add some emergency response agencies as required by VHWMR §9.3.C.

Containers were stored in the less than 90-day accumulation area in a manner that did not allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in the event of an emergency (VHWMR §9.2.E). Container inspections required by VHWMR §9.8.E cannot be properly accomplished with the current method of storage (four rows of drums on pallets and/or large bags three deep and stacked two high). The need for an increase in storage area, or some system of storage racks was discussed during the inspection.

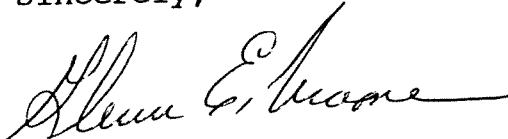
Mr. Paul Bauz  
Page 2

The addition of another plating operation and changing to large bags instead of 55 gallon drums for waste accumulation have caused the need to establish two new accumulation areas. Since the bags have a capacity greater than 55 gallons the accumulation areas near each filter press can no longer be satellite accumulation areas (VHWMR §6.4.e.3.a.) and must be designated as less than 90-day accumulation areas. Please note that bags must always be closed except as necessary to add waste (VHWMR §9.8.D.1).

Please take the appropriate corrective action to bring your facility into compliance with the regulations within 30 days of receipt of this letter and send a letter to the Department at that time stating that you have done so.

If you have any questions regarding this matter, please call me at (804) 225-2667 or Robert Lincoln at (804) 786-7111.

Sincerely,



Glenn E. Moore  
Hazardous Waste Compliance Manager  
Waste Division

Enclosures

cc: Sherri Eng, Waste Division, OCE  
Robert Lincoln, Waste Division, OCE

MARCH 1991

SURVEY SHEET  
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

Name of Facility: Rehrig International  
Address: 901 North Lombardy Street  
Richmond, VA 23220  
EPA ID Number: VAD089028377  
Facility Representative: Paul Bauz  
Title: Plating Manager  
Telephone Number: (804) 355-7864  
Inspector's Name: Glenn E. Moore, Robert Lincoln  
Title: Hazardous Waste Compliance Manager, Analytical Chemist  
Date of Inspection: May 13, 1993

---

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.) Manufacturer of shopping carts and shopping baskets.

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

F006 Stabilized waste sludge from nickel trichrome plating process

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
<u>F006</u>	<u>8,666 lbs/month *</u>	<u>24,500 lbs **</u>

\* Based on 1992 single line operation

\*\* Includes waste from second line starting in April 1993

4. Does the facility ever generate greater than:  
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)? NO

100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste? NO

If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent? (List all transporters and facilities, or on-site treatment performed).

F006	<u>Envirosafe Services of Ohio, OHD045247905.</u>	<u>Transporter</u>
	<u>Buffalo Fuel Corp. NYD051809952</u>	<u>Transporter</u>
	<u>Envirosafe Services of Ohio, OHD045243706.</u>	<u>TSD</u>

6. Does the facility generate any hazardous waste that is excluded from regulation? If yes, list the waste and the basis for exclusion. NO

7. Does the facility generate any hazardous waste that is burned for energy recovery (hazardous waste fuel)? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist. NO

8. Does the facility generate any used oil that is burned for energy recovery (used oil fuel), including used oil that is also a characteristic hazardous waste, or used oil that is mixed with hazardous waste generated by a conditionally exempt Small Quantity Generator? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist. NO

9. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist. NO

10. Does the facility transport, collect or reclaim spent lead-acid batteries? If yes, complete the Recyclable Materials Checklist. NO

11. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
  - b. small quantity generator
  - c. generator
  - d. permitted or interim status TSD
  - e. unpermitted TSD (explain in comments section)
- [Circle All That Are Applicable]

12. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5 55-gallon drums) of non-acute hazardous waste, at which time the accumulation times (180 days or 270 days) for small quantity generators begins.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

13. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

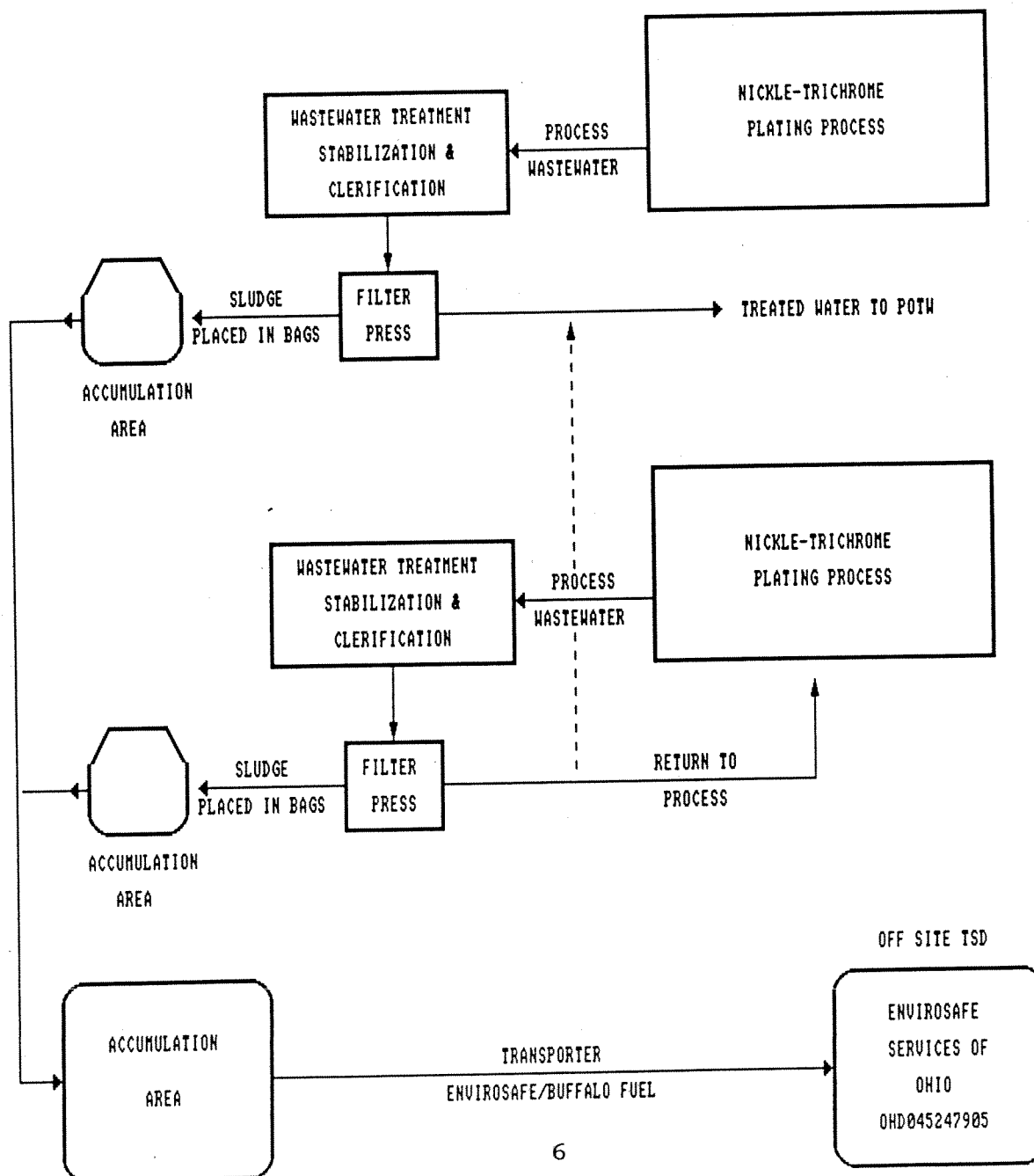
Location	Number of Containers	Number of Tanks	Capacity
<u>#1 Filter Press</u>	<u>1 bag</u>	<u>N/A</u>	<u>1500 lbs</u>
<u>#2 Filter Press</u>	<u>1 bag</u>	<u>N/A</u>	<u>1500 lbs</u>
<u>90-day accumulation area</u>	<u>20 drums</u> <u>10 bags</u>	<u>N/A</u>	<u>55 gal</u> <u>1500 lbs</u>

14. Comments

Areas adjacent to the filter presses are accumulation areas since more than 55 gallons is accumulated at a time (1500 lb bags are used to collect the waste). The bags therefore need to be labeled as hazardous waste and dated when accumulation begins. Notification is required for the new accumulation areas. Bags must be kept closed except when waste is actually being added.

# 15. Waste Management Flow Diagram

(On this page sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any waste water treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)





MARCH 1991

CHECKLIST FOR HAZARDOUS WASTE  
INSPECTION OF GENERATORS

Name of Facility: Rehrig International

EPA ID Number: VAD089028377

Date of Inspection: 5/13/93

---

Va. Hazardous  
Waste Reg.

Generator Checklist

- |                 |   |     |
|-----------------|---|-----|
| 6.3.            | 1. Is a manifest system currently being used for all hazardous waste shipped off site?  | YES |
| 6.2.C.          | 2. Has the generator determined that the transporter(s) and facility have an EPA ID number? [Note: Shipments to POTWs must be manifested and the POTW must meet all permit-by-rule requirements of VHWMR Section 11.8.B.] | YES |
| 5.5.A.7         | 3. Has the generator determined that the transporter has a valid EPA Identification number and a valid Virginia Transporter Permit?   | YES |
| 6.3<br>5.3.B.1. | 4. Is the following information on the manifest:<br><br>a. The generator's name, mailing address, EPA ID Number, and telephone number?  | YES |
| 5.3.B.2.        | b. A unique five digit number assigned to this manifest by the generator?   | YES |
| 5.3.B.3.        | c. The total number of pages of the manifest?   | YES |
| 5.3.B.4.        | d. The company name and EPA ID number of each transporter used?   | YES |


- 5.3.B.5. e. The company name, site address, and EPA ID number of the facility designated to receive the waste? YES
- 5.3.B.6. f. The U. S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material? YES
- 5.3.B.7. g. The quantities of waste being shipped? YES
- 5.3.C. h. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment." YES
- 6.5.C.2. 5. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago? YES
- If no, has the generator filed an exception report with the Executive Director which included: N/A
- 6.5.C.2.a. a. A legible copy of the manifest for which the generator does not have confirmation of the delivery; and N/A
- 6.5.C.2.b. b. A cover letter explaining the efforts taken to locate the shipment? N/A

6.4.E.1.	6. Is hazardous waste being accumulated on-site for less than 90 days? If <u>yes</u> ,	YES
6.4.E.1.a.	a. Is the waste stored in containers? In tanks? (If answer to either question is <u>yes</u> , fill out appropriate checklists. If both answers are <u>no</u> , interim status or a TSD permit is required - fill out facility checklist to determine compliance status).	YES NO
6.4.E.1.b.	b. Is the date that accumulation begins clearly marked and visible for inspection on each container?	YES
6.4.E.1.c.	c. Is each <u>container</u> and tank clearly marked with the words "Hazardous Waste"?	YES
6.4.E.1.e.	d. Has the generator notified the Executive Director by March 1, 1988, of the exact location of the existing accumulation areas, and at least 15 days prior to use for subsequently established accumulation areas? <u>New notification is required for the filter press areas, see Survey Sheet.</u>	NO
6.4.E.2.	7. Does the generator accumulate (store) hazardous waste on-site for greater than 90 days? If <u>yes</u> , interim status or a TSD permit is required - fill out facility checklist to determine compliance status.	NO
6.4.E.1.d. 9.1.F.4.	8. Does the generator record inspections in an inspection log?	YES
6.4.E.1.d. 9.1.G.1.	9. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?	YES
9.1.G.2.	10. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility?	YES



- 9.1.G.3. 11. Do personnel participate in an annual review of the initial training? YES
12. Does the facility maintain a record of the following:
- 9.1.G.4.a. a. job titles for each position at the facility related to hazardous waste management; and YES
- 9.1.G.4.a. b. the name of the employee filling each job; and YES
- 9.1.G.4.b c. a written job description for each position in (a); and YES
- 9.1.G.4.c. d. a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in (a); and YES
- 9.1.G.4.d. e. Records that document that the training or job experience required above has been given to, and completed by facility personnel? YES
- 9.2.B. 13. At the facility, is the following equipment installed:
- 9.2.D.
- 9.2.B.1. a. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste generation or accumulation areas are threatened by hazardous waste release, fire or explosion? YES
- 9.2.B.2. b. A device (at the scene of hazardous waste generator operations) capable of summoning emergency assistance from Police, Fire Departments, etc.? YES
- 9.2.B.3. c. Portable fire extinguishers, fire control, and decontamination equipment?; and YES

- 9.2.B.4. d. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system? YES
- 9.2.C. 14. Is a record of tests and inspections of items 13 a-d maintained at the facility? YES
- 9.2.E. 15. Does the facility have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies? The less than 90-day storage area does not have adequate aisle space between containers. Large bags and drums on pallets were three deep, four wide and two high in the accumulation area. NO ✓
- 6.4.E.1.d. 16. Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water? YES  
9.3.
- 9.3.B. 17. Does the contingency plan contain the following elements:
- 9.3.B.(1,2). a. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water? YES
- 9.3.B.3. b. A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams to coordinate emergency services, as required? YES

- 9.3.B.4. c. A listing of names, addresses, and office and home phone numbers of all persons qualified to act as emergency coordinator? List primary Coordinator. YES
- Name: Paul Bauz
- Title: Plating Manager
- Telephone: Work: (804) 355-7864  
Home: (804) 262-2268
- 9.3.B.5. d. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? YES
- 9.3.B.6. e. Does this list specify the location and physical description of each item on the list and a brief outline of its capabilities? YES
- 9.3.B.6. f. An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? YES
- 9.3.C. g. Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? List: NO
- Richmond Fire Department  
Richmond Police Department  
Stuart Circle Hospital  
VA Department of Waste Management
- Updating needed. See comment Item 21.
- 9.3.C. h. Is there documentation to indicate the personnel listed above received the contingency plan? YES
- 

9.3.F.(9,10).	i. Has the contingency plan ever been implemented?	NO
	If <u>yes</u> , was a written report filed with the Executive Director and were the Executive Director and other required authorities properly notified before operations resumed?	N/A
6.4.E.3.a.	18. Does the generator have satellite accumulation areas? If <u>yes</u> ,	NO
	a. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?	N/A
6.4.E.3.a.(1) 9.8.B.	b. Are the containers in good condition?	N/A
6.4.E.3.a.(1) 9.8.C.	c. Are the containers compatible with the waste?	N/A
6.4.E.3.a.(1) 9.8.D.1.	d. Are the containers kept closed except as necessary to add or remove waste?	N/A
6.4.E.3.a.(2)	e. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?	N/A
6.5.E.3.b.	f. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If <u>yes</u> ,	N/A
	(1) Has the generator marked the <u>excess amount</u> with the date the excess amount began accumulating?	N/A
	(2) Has the generator either removed the excess amount within three days of the date of excess accumulations or has he complied with all other provisions for accumulation areas listed in question 5 on this checklist? Namely, has he notified the Executive Director about the	N/A

location of the accumulation area?

If no, what has the generator chosen to do?

6.5.A. 19. Does the generator retain copies of all manifests, annual reports, and test results for at least three years? YES

6.5.B. 20. Has the facility submitted an annual report for the preceding calendar year? YES

21. Comments: The lack of sufficient aisle space in the less than 90-day accumulation area is a major concern. The ability to respond to emergencies is greatly diminished, as noted above. We had difficulty seeing the labels and the condition of several of the containers during the inspection.

Notification is required for both new accumulation areas at each filter press.

The following revisions to your Contingency Plan are needed:

1. Appoint and specify a new alternate emergency coordinator

2. Specify new accumulation areas in the plan text and diagrams.

3. Add the following to the emergency response list:  
Virginia Department of Emergency Services, (804) 674-2400; and  
Richmond LEPC, (804) 780-6660

4. Send a revised Contingency Plan or change pages to each required emergency response agency. Please obtain documentation of their receipt of the plan.



MARCH 1991

INSPECTION CHECKLIST FOR  
THE USE AND MANAGEMENT OF CONTAINERS

Name of Facility: Rehrig International

EPA ID Number: VAD089028377

Date of Inspection: 5/13/93

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Va. Hazardous  
Waste Reg.

9.8.B.                    1.     Are all containers holding                    YES  
                             hazardous waste in good condition,  
                             i.e., not showing signs of leakage or  
                             corrosion or any other  
                             deterioration/deformation?

If no, list the storage/accumulation  
areas where there are problems and  
the type of problem:

9.8.C.                    2.     Are the containers lined or made                    YES  
                             of materials compatible with  
                             hazardous waste placed into them so  
                             that the container will not react  
                             with, or otherwise be incompatible  
                             with, the hazardous wastes stored?

6.4.E.b                   3.     Is the date upon which each                    YES  
                             period of accumulation begins clearly  
                             marked and visible for inspection on  
                             each container?

6.4.E.c.                   4.     Is the container labeled or                    YES  
                             marked clearly with the words  
                             "Hazardous Waste"?

9.8.D.1.                   5.     Are all containers holding                    NO  
                             hazardous waste kept closed during  
                             storage except as necessary to add or  
                             remove waste?

If no, list the locations where open  
containers are found. Bag was open  
at the former satellite area near  
filter press #1.



- 9.8.E. 6. Are areas where hazardous waste containers are stored inspected by the owner/operator at least weekly? YES
- 9.1.F.2.a. 7. For large quantity generators and TSD facilities only:  
 9.1.F.4. Is an inspection log maintained? YES  
 6.4.E.1.d.
- 9.8.F. 8. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line? N/A
- 9.8.G.1. 9. Are incompatible wastes placed in separate containers? N/A
- 9.8.G.3. 10. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices? N/A
- 6.4.E.3.a. 11. For satellite accumulation areas:  
 a. Is the area at or near the point the point of generation? (If no, the area is not a satellite accumulation area, and inspection and notification requirements are applicable). N/A  
 b. Are there more than 55 gallons of any one type of waste present in the area? N/A
- If yes,

6.4.E.3.b

c. Has the amount in excess of 55 gallons been in the satellite accumulation area longer than 3 days?

N/A

If yes,

6.4.E.3.b.

6.4.E.1.b.

d. Has the company notified the Department about the location of the accumulation area?

N/A

10. Comments: Container (bag) in the accumulation area near the old filter press contained waste and was open. Containers must always be closed except as needed to add or remove waste.

November 1991

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF  
LAND-RESTRICTED WASTE MANAGEMENT

Name of Facility: Rehrig International

EPA ID Number: VAD089028377

Date of Inspection: 5/13/93

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1. Does the facility generate, transport, or treat, store or dispose any land-restricted wastes? (See Attachment)

If yes, please list:

F006      Nickel trichrome plating sludge

15.1.A.3.      2. Is land disposal of wastes listed in 1 above occurring?      NO

If yes, then:

15.1.A.3.a.      a. Has the facility been granted an extension to the effective date for land restrictions applicable to its restricted waste? (See effective dates listed in Attachment)      N/A

15.1.A.3.b.      b. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition?      N/A

15.1.A.3.c.      c. Is the waste generated by small quantity generators of less than 220 pounds (100 kg) of hazardous waste, or 1 kg of acutely hazardous waste, per month?      N/A

15.1.E.      d. Has the owner/operator submitted an application for a case-by-case extension to the effective date of any applicable restriction?      N/A

15.1.F.	e. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?	N/A
15.1.C.	3. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?	NO
15.1.D.1.	4. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (If <u>no</u> , go to number 6) [If <u>yes</u> , complete surface impoundment checklist]  [Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.]  If <u>yes</u> , does the facility meet the following requirements:	NO
15.1.D.1.b 15.1.G. 15.3.C. 15.4. 15.3.	a. Are the residues of the treatment analyzed as specified in VHWMR Sections 15.1.G. or 15.3.C. to determine if they meet the applicable treatment standards or VHWMR Section 15.4, or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR Section 15.3?	N/A
15.1.D.1.c. 10.B.1. 10.10.B.3.	b. Has the owner or operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liners?	N/A
15.1.D.1.c. 10.5.	c. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR Section 10.5.?	N/A

15.1.D.1.d.	d. Has the owner or operator submitted a written certification to the Executive Director that items a-c have been met which states,  "I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted wastes. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."?	N/A
15.1.D.1.d.	e. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification?	N/A
15.1.G.1.	5. Has the owner/operator determined if his waste is a land restricted waste?	YES
15.1.G.1.a.	6. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied <b>each</b> shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?  Did the notification include the following information:	YES
15.1.G.1.b.1.a	- EPA Hazardous Waste Number;	YES
15.1.G.1.b.1.b	- The corresponding treatment standards and all applicable prohibitions set forth in VHWMR Section 15.3.C;	YES
15.1.G.1.b.1.c	- The manifest number associated with the shipment of waste;	YES
15.1.G.1.b.1.d	- Waste analysis data, where available?	YES

15.1.G.1.b.	7. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied <b>each</b> shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR Section 15.3.C?	N/A
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a. Did the notification contain the following information:

15.1.G.1.b.1.a	- EPA Hazardous Waste Number;	N/A
15.1.G.1.b.1.b	- The corresponding treatment standards and all applicable prohibitions;	N/A
15.1.G.1.b.1.c	- The manifest number associated with the shipment of waste; and	N/A
15.1.G.1.b.1.d	- Waste analysis data, where available?	N/A

15.1.G.1.b.2.	b. Was the certification signed by an authorized representative, and did it state the following:	N/A
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"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR Section 15.4. and all applicable prohibitions set forth in VHWMR Section 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

15.1.G.1.c.	8. For restricted wastes which have received a case-by-case exemption, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded a notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?	N/A
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15.1.G.f.	9. Does the generator retain on-site copies of all notices, certification, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	YES
15.1.G.2.	10. <u>For Treatment Facilities ONLY</u> : Has the owner or operator of the treatment facility tested the treatment residues or extract to assure that they shall meet the applicable treatment standards?	N/A
15.1.G.2.	a. Has this testing been done at the frequency stated in the waste analysis plan?	N/A
15.1.G.2.a. 15.1.G.1.a.	b. For treatment residuals which do not meet the applicable treatment standards, has the facility filed the notification in 8 above as a generator to any subsequent treatment facilities?	N/A



15.1.G.2.b.

c. For treated wastes meeting the applicable treatment standards, or for wastes not subject to any treatment standards, has a certification been signed and accompanies each shipment stating:

N/A

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in VHWMR Sections 15.4 and 15.3.C. without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

OR (for wastes with treatment standards expressed as technologies)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of VHWMR Section 15.4.C. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

15.5.

11. Is the generator storing land restricted waste? (For one year storage only)

N/A

15.5.1.a.

a. If yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facility proper recovery, treatment or disposal?

N/A

12. Comments: None.

Attachment - Land Restricted Wastes

<u>Waste</u>	<u>Effective Date</u>
F001 - F005	11/08/86
F001 - F005 from Small Quantity Generators, generated via RCRA corrective actions or CERCLA response actions, and hazardous wastes containing less than 1% total solvent constituents	11/08/88
F001 - F005 soil and debris resulting from RCRA corrective actions or CERCLA response actions	11/08/90

California Listed Wastes

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing free cyanides at concentrations greater than or equal to 1,000 ppm (mg/l). 7/8/87

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing any of the following metals or compounds of these metals at concentrations greater than or equal to those specified below:

Arsenic (as As)	500 mg/l
Cadmium (as Cd)	100 mg/l
Chromium (as Cr VI)	500 mg/l
Lead (as Pb)	500 mg/l
Mercury (as Hg)	20 mg/l
Nickel (as Ni)	134 mg/l
Selenium (as Se)	100 mg/l
Thallium (as Tl)	130 mg/l

Liquid hazardous wastes having a Ph less than or equal to 2.0. 7/8/87

Liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. 7/8/87

Liquid hazardous wastes, primarily water, containing greater than or equal to 1000 mg/l HOCs, but less than or equal to 10,000 mg/l HOCs. 7/8/87

California waste contaminated soil and debris resulting from RCRA corrective actions or CERCLA response actions. 11/8/90

Liquid hazardous wastes, not primarily water, containing greater than or equal to 1000 mg/l HOCs. 11/8/88

Non-liquid (non-RCRA/CERCLA) hazardous wastes containing greater than or equal to 1000 mg/l HOCs. 11/8/88

Effective Dates of Land Disposal Restricted Wastes

<u>Waste Code</u>	<u>Waste Category</u>	<u>Effective Date</u>
D001	All	Aug. 8, 1990
D002	All	Aug. 8, 1990
D003	All	Aug. 8, 1990
D004	Inorganic Solid Debris	May 8, 1992
D004	Non-wastewater	May 8, 1992
D004	Wastewater	Aug. 8, 1990
D005	Inorganic solid debris	May 8, 1992
D005	All others	Aug. 8, 1990
D006	Inorganic solid debris	May 8, 1992
D006	All others	Aug. 8, 1990
D007	Inorganic solid debris	May 8, 1992
D007	All others	Aug. 8, 1990
D008	Inorganic solid debris	May 8, 1992
D008	Lead acid batteries	May 8, 1992
D008	All others	Aug. 8, 1990
D009	Inorganic solid debris	May 8, 1992
D009	High mercury non-wastewater	May 8, 1992
D009	Low mercury non-wastewater	May 8, 1992
D009	All others	Aug. 8, 1990
D010	Inorganic solid debris	May 8, 1992
D010	All others	Aug. 8, 1990
D011	Inorganic solid debris	May 8, 1992
D011	All others	Aug. 8, 1990
D012	All	Aug. 8, 1990
D013	All	Aug. 8, 1990
D014	All	Aug. 8, 1990
D015	All	Aug. 8, 1990
D016	All	Aug. 8, 1990
D017	All	Aug. 8, 1990
F002	All	Aug. 8, 1990
F005	All	Aug. 8, 1990
F006	Wastewater	Aug. 8, 1990
F006	Non-wastewater	Aug. 8, 1988
F006 (cyan.)	Non-wastewater	July 8, 1989
F007	All	July 8, 1989
F008	All	July 8, 1989
F009	All	July 8, 1989
F010	Soil & debris	June 8, 1991
F010	All others	June 8, 1989
F011	All	July 8, 1989
F012	All	July 8, 1989
F019	All	Aug. 8, 1990
F020	Soil & debris	Nov. 8, 1990
F020	All others	Nov. 8, 1988
F021	Soil & debris	Nov. 8, 1990
F021	All others	Nov. 8, 1988
F022	Soil & debris	Nov. 8, 1990
F022	All others	Nov. 8, 1988
F023	Soil & debris	Nov. 8, 1990
F023	All others	Nov. 8, 1988
F024	Soil & debris	June 8, 1991
F024 metals dioxins/ furans	Non-wastewater	Aug. 8, 1990
	All	Aug. 8, 1990
F024	All others	June 8, 1989
F026	All	Aug. 8, 1990
F026	Soil & debris	Nov. 8, 1990
F026	All others	Nov. 8, 1988
F027	Soil and debris	Nov. 8, 1990
F027	All others	Nov. 8, 1988
F028	Soil and debris	Nov. 8, 1990
F028	All others	Nov. 8, 1988
F039	Wastewater	Aug. 8, 1990
F039	Non-wastewater	May 8, 1992
K001	Soil & debris	Aug. 8, 1988
K001 lead/ organics	All	Aug. 8, 1990
K001	All others	Aug. 8, 1990
K002	All	Aug. 8, 1990
K003	All	Aug. 8, 1990
K004	All	Aug. 8, 1990
K005	All	Aug. 8, 1990
K006	All	Aug. 8, 1990
K007	All	Aug. 8, 1990
K008	All	Aug. 8, 1990
K009	Soil & debris	June 8, 1991
K009	All others	June 8, 1989
K010	Soil & debris	June 8, 1991
K010	All others	June 8, 1989
K011	Wastewater	Aug. 8, 1990
K011	Non-wastewater	June 8, 1989

K011	Soil & debris	June 8, 1991
K013	Wastewater	Aug. 8, 1990
K013	Non-wastewater	June 8, 1989
K013	Soil & debris	June 8, 1991
K014	Wastewater	Aug. 8, 1990
K014	Non-wastewater	June 8, 1989
K014	Soil & debris	June 8, 1991
K016	Wastewater	Aug. 8, 1988
K016	Non-wastewater	Aug. 8, 1990
K016	Soil & debris	Aug. 8, 1990
K017	All others	Aug. 8, 1990
K018	Soil & debris	Aug. 8, 1988
K018	All others	Aug. 8, 1990
K019	Soil & debris	Aug. 8, 1988
K019	All others	Aug. 8, 1990
K020	Soil & debris	Aug. 8, 1988
K020	All others	Aug. 8, 1990
K021	All	Aug. 8, 1990
K022	Wastewater	Aug. 8, 1988
K022	Non-wastewater	Aug. 8, 1990
K022	Soil & debris	
K023	Soil & debris	June 8, 1991
K023	All others	June 8, 1989
K024	Soil & debris	Aug. 8, 1990
K024	All others	Aug. 8, 1988
K026	All	Aug. 8, 1990
K026	All	Aug. 8, 1990
K027	Soil & debris	June 8, 1991
K027	All others	June 8, 1989
K028	Soil & debris	June 8, 1991
K028 metals	Non-wastewater	Aug. 8, 1990
	All others	June 8, 1989
	Wastewater	Aug. 8, 1990
	Non-wastewater	June 8, 1989
K029	Soil & debris	June 8, 1991
K030	Soil & debris	Aug. 8, 1990
K030	All others	Aug. 8, 1988
K031	Wastewater	Aug. 8, 1990
K031	Non-wastewater	May 8, 1992
K032	All	Aug. 8, 1990
K033	All	Aug. 8, 1990
K034	All	Aug. 8, 1990
K035	All	Aug. 8, 1990
K036	all	Aug. 8, 1990
K037	Soil & debris	Aug. 8, 1990
K037	Wastewater	Aug. 8, 1988
K037	All others	June 8, 1991
K038	Soil & debris	June 8, 1989
K038	All others	June 8, 1991
K039	Soil & debris	June 8, 1989
K039	All others	June 8, 1991
K040	Soil & debris	June 8, 1989
K040	All others	June 8, 1988
K041	All	Aug. 8, 1990
K042	All	Aug. 8, 1990
K043	Soil & debris	Aug. 8, 1988
K043	All others	Aug. 8, 1990
K044	All	Aug. 8, 1990
K045	All	Aug. 8, 1990
K046	Nonreactive non-wastewater	Aug. 8, 1988
K046	All others	Aug. 8, 1990
K047	All	Aug. 8, 1990
K048	Wastewater	Aug. 8, 1990
K048	Non-wastewater	Nov. 8, 1990
K049	Wastewater	Aug. 8, 1990
K049	Non-wastewater	Nov. 8, 1990
K050	Wastewater	Aug. 8, 1990
K050	Non-wastewater	Nov. 8, 1990
K051	Wastewater	Aug. 8, 1990
K051	Non-wastewater	Nov. 8, 1990
K052	Wastewater	Aug. 8, 1990
K052	Non-wastewater	Nov. 8, 1990
K060	All	Aug. 8, 1990
K061	Wastewater	Aug. 8, 1990
K061	Non-wastewater	Aug. 8, 1988
K062	All	Aug. 8, 1988
K069	All	Aug. 8, 1990
K073	All	Aug. 8, 1990
K083	All	Aug. 8, 1990
K084	Wastewater	May 8, 1992
K084	Non-wastewater	Aug. 8, 1990
K085	All	Aug. 8, 1990
K086	All	Aug. 8, 1990
K087	Soil & debris	Aug. 8, 1990
K087	All others	Aug. 8, 1988
K093	Soil and debris	June 8, 1991

K093	All others	June 8, 1989
K094	Soil & debris	June 8, 1991
K094	All others	June 8, 1989
K095	wastewater	Aug. 8, 1990
K095	Non-wastewater	June 8, 1989
K095	Soil & debris	June 8, 1991
K096	Wastewater	Aug. 8, 1990
K096	Non-wastewater	June 8, 1989
K096	Soil & debris	June 8, 1991
K097	All	Aug. 8, 1990
K098	All	Aug. 8, 1990
K099	All	Aug. 8, 1988
K100	All	Aug. 8, 1990
K101	Wastewater	Aug. 8, 1988
K101	Non-wastewater	May 8, 1992
K102	Wastewater	Aug. 8, 1988
K102	Non-wastewater	May 8, 1992
K103	Soil & debris	Aug. 8, 1990
K103	All others	Aug. 8, 1988
K104	Soil and debris	Aug. 8, 1990
K014	All others	Aug. 8, 1988
K105	All	Aug. 8, 1990
K106	High mercury non-wastewater	May 8, 1992
K106	Low mercury non-wastewater	May 8, 1992
K106	All others	Aug. 8, 1990
K113	Soil & debris	June 8, 1991
K113	All others	June 8, 1989
K114	Soil & debris	June 8, 1991
K114	All others	June 8, 1989
K115	Soil & debris	June 8, 1991
K115	All others	June 8, 1989
K116	Soil & debris	June 8, 1991
K116	All others	June 8, 1989

P001	All	Aug. 8, 1990
P002	All	Aug. 8, 1990
P003	All	Aug. 8, 1990
P004	All	Aug. 8, 1990
P005	All	Aug. 8, 1990
P006	All	Aug. 8, 1990
P007	All	Aug. 8, 1990
P008	All	Aug. 8, 1990
P009	All	Aug. 8, 1990
P010	Wastewater	May 8, 1992
P010	Non-wastewater	Aug. 8, 1990
P011	Wastewater	May 8, 1992
P011	Non-wastewater	Aug. 8, 1990
P012	Wastewater	May 8, 1992
P012	Non-wastewater	Aug. 8, 1990
P013	All	Aug. 8, 1990
P014	All	Aug. 8, 1990
P015	All	Aug. 8, 1990
P016	All	Aug. 8, 1990
P017	All	Aug. 8, 1990
P018	All	Aug. 8, 1990
P020	All	June 8, 1989
P021	All	Aug. 8, 1990
P022	All	Aug. 8, 1990
P023	All	Aug. 8, 1990
P024	All	Aug. 8, 1990
P026	All	Aug. 8, 1990
P027	All	Aug. 8, 1990
P028	All	June 8, 1989
P029	All	June 8, 1989
P030	All	Aug. 8, 1990
P031	All	Aug. 8, 1990
P031	All	Aug. 8, 1990
P034	All	Aug. 8, 1990
P036	Wastewater	May 8, 1992
P036	Non-wastewater	Aug. 8, 1990
P037	All	Aug. 8, 1990
P038	Wastewater	May 8, 1992
P038	Non-wastewater	June 8, 1991
P039	Soil & debris	June 8, 1989
P039	All others	June 8, 1991
P040	Soil and debris	June 8, 1989
P040	All others	June 8, 1991
P041	Soil land debris	June 8, 1989
P041	All others	Aug. 8, 1990
P042	All	June 8, 1991
P043	Soil & debris	June 8, 1989
P043	All others	June 8, 1991
P044	Soil & debris	June 8, 1989
P044	All others	Aug. 8, 1990
P045	All	Aug. 8, 1990
P046	All	Aug. 8, 1990
P047	All	Aug. 8, 1990
P048	All	Aug. 8, 1990
P049	All	Aug. 8, 1990
P050	All	Aug. 8, 1990
P051	All	Aug. 8, 1990
P054	All	Aug. 8, 1990
P056	All	Aug. 8, 1990
P057	All	Aug. 8, 1990
P058	All	Aug. 8, 1990
P059	All	Aug. 8, 1990
P060	All	June 8, 1991
P062	Soil & debris	June 8, 1989
P062	All others	June 8, 1989
P063	All	Aug. 8, 1990
P064	All	May 8, 1992
P065	High mercury non-wastewater	May 8, 1992
P065	Low mercury non-wastewater	Aug. 8, 1990
P066	All others	Aug. 8, 1990
P066	All	Aug. 8, 1990
P067	All	Aug. 8, 1990
P068	All	Aug. 8, 1990
P069	All	Aug. 8, 1990
P070	All	June 8, 1991
P071	Soil & debris	June 8, 1989
P071	All others	Aug. 8, 1990
P072	All	Aug. 8, 1990
P073	All	June 8, 1989
P074	All	Aug. 8, 1990
P075	All	Aug. 8, 1990
P076	All	Aug. 8, 1990
P077	All	Aug. 8, 1990
P078	All	Aug. 8, 1990
P081	All	Aug. 8, 1990
P082	All	Aug. 8, 1990
P084	All	Aug. 8, 1990

P085	Soil & debris	June 8, 1991
P086	All others	June 8, 1989
P087	All	May 8, 1992
P088	All	Aug. 8, 1990
P089	Soil & debris	June 8, 1991
P089	All others	June 8, 1989
P092	High mercury non-wastewater	May 8, 1992
P092	Low mercury non-wastewater	May 8, 1992
P092	All others	Aug. 8, 1990
P093	Soil & debris	May 8, 1992
P093	All others	Aug. 8, 1990
P094	Soil & debris	June 8, 1991
P094	All others	June 8, 1989
P095	Soil & debris	May 8, 1992
P095	All others	Aug. 8, 1990
P096	All	Aug. 8, 1990
P097	Soil & debris	June 8, 1991
P097	All others	June 8, 1989
P098	All	June 8, 1989
P099 silver	Wastewater	Aug. 8, 1990
P099 cyanides	Wastewater	June 8, 1989
P099 cyanides/ silver	Non-wastewater	June 8, 1989
P101	All	Aug. 8, 1990
P102	All	Aug. 8, 1990
P103	All	Aug. 8, 1990
P104 silver	Wastewater	Aug. 8, 1990
P104 cyanides	Wastewater	June 8, 1989
P104 cyanides/ silver	Non-wastewater	June 8, 1989
P106	All	Aug. 8, 1990
P106	All	June 8, 1989
P108	Soil & debris	May 8, 1992
P108	All others	Aug. 8, 1990
P109	Soil and debris	June 8, 1991
P109	All others	June 8, 1989
P110	All	Aug. 8, 1990
P111	Soil & debris	June 8, 1991
P111	All others	June 8, 1989
P112	All	Aug. 8, 1990
P113	All	Aug. 8, 1990
P114	All	Aug. 8, 1990
P115	All	Aug. 8, 1990
P116	Soil & debris	May 8, 1992
P116	All others	Aug. 8, 1990
P118	Soil & debris	May 8, 1992
P118	All others	Aug. 8, 1990
P119	All	Aug. 8, 1990
P120	All	Aug. 8, 1990
P121	All	June 8, 1989
P122	All	Aug. 8, 1990
P123	All	Aug. 8, 1990
U001	All	Aug. 8, 1990
U002	All	Aug. 8, 1990
U003	Soil & debris	May 8, 1992
U003	All others	Aug. 8, 1990
U004	All	Aug. 8, 1990
U005	All	Aug. 8, 1990
U006	Soil & debris	May 8, 1992
U006	All others	Aug. 8, 1990
U007	Soil & debris	May 8, 1992
U007	All others	Aug. 8, 1990
U008	All	Aug. 8, 1990
U009	All	Aug. 8, 1990
U010	Soil & debris	May 8, 1992
U010	All others	Aug. 8, 1990
U011	Soil & debris	May 8, 1992
U011	All others	Aug. 8, 1990
U012	All	Aug. 8, 1990
U014	Soil & debris	May 8, 1992
U014	All others	Aug. 8, 1990
U015	Soil & debris	May 8, 1992
U015	All others	Aug. 8, 1990
U016	All	Aug. 8, 1990
U017	Soil & debris	May 8, 1992
U017	All others	Aug. 8, 1990
U018	All	Aug. 8, 190
U018	All	Aug. 8, 1990
U020	Soil & debris	May 8, 1992
U020	All others	Aug. 8, 1990
U021	Soil & debris	May 8, 1992
U021	All others	Aug. 8, 1990
U022	All	Aug. 8, 1990
U023	All	Aug. 8, 1990
U024	All	Aug. 8, 1990
U026	All	Aug. 8, 1990

U026	Soil & debris	May 8, 1992
U026	All others	Aug. 8, 1990
U027	All	Aug. 8, 1990
U028	Soil & debris	June 8, 1991
U028	All others	June 8, 1989
U029	All	Aug. 8, 1990
U030	All	Aug. 8, 1990
U031	All	Aug. 8, 1990
U032	All	May 8, 1992
U033	Soil & debris	Aug. 8, 1990
U033	All others	May 8, 1992
U034	Soil & debris	Aug. 8, 1990
U034	All others	May 8, 1992
U035	Soil & debris	Aug. 8, 1990
U036	All others	Aug. 8, 1990
U036	All	Aug. 8, 1990
U037	All	May 8, 1992
U038	Soil & debris	Aug. 8, 1990
U038	All others	Aug. 8, 1990
U039	All	May 8, 1992
U041	Soil & debris	Aug. 8, 1990
U041	All others	May 8, 1992
U042	Soil & debris	Aug. 8, 1990
U042	All others	Aug. 8, 1990
U043	All	Aug. 8, 1990
U044	All	Aug. 8, 1990
U045	All	May 8, 1992
U046	Soil & debris	Aug. 8, 1990
U046	All others	Aug. 8, 1990
U047	All	Aug. 8, 1990
U048	All	May 8, 1992
U049	Soil & debris	Aug. 8, 1990
U049	All others	Aug. 8, 1990
U051	All	Aug. 8, 1990
U052	All	Aug. 8, 1990
U053	All	Aug. 8, 1990
U055	All	Aug. 8, 1990
U056	All	Aug. 8, 1990
U057	All	June 8, 1992
U058	Soil & debris	June 8, 1989
U058	All others	May 8, 1992
U059	Soil & debris	Aug. 8, 1990
U059	All others	May 8, 1992
U060	Soil & debris	Aug. 8, 1990
U060	All others	May 8, 1992
U061	Soil & debris	Aug. 8, 1990
U061	All others	May 8, 1992
U062	Soil & debris	Aug. 8, 1990
U062	All others	Aug. 8, 1990
U063	All	Aug. 8, 1990
U064	All	Aug. 8, 1990
U066	All	Aug. 8, 1990
U067	All	Aug. 8, 1990
U068	All	Aug. 8, 1990
U069	Soil & debris	June 8, 1991
U069	All others	June 8, 1989
U070	All	Aug. 8, 1990
U071	All	Aug. 8, 1990
U072	All	May 8, 1992
U073	Soil & debris	Aug. 8, 1990
U073	All others	May 8, 1992
U074	Soil & debris	Aug. 8, 1990
U074	All others	Aug. 8, 1990
U075	All	Aug. 8, 1990
U076	All	Aug. 8, 1990
U077	All	Aug. 8, 1990
U078	All	Aug. 8, 1990
U079	All	Aug. 8, 1990
U080	All	Aug. 8, 1990
U081	All	Aug. 8, 1990
U082	All	Aug. 8, 1990
U083	All	Aug. 8, 1990
U084	All	Aug. 8, 1990
U085	All	Aug. 8, 1990
U086	All	June 8, 1991
U087	Soil & debris	June 8, 1989
U087	All others	June 8, 1991
U088	Soil & debris	June 8, 1989
U088	All others	Aug. 8, 1990
U089	All	Aug. 8, 1990
U090	All	May 8, 1992
U091	Soil & debris	Aug. 8, 1990
U091	All others	May 8, 1992
U092	Soil & debris	Aug. 8, 1990
U092	All others	



U093	Soil & debris	May 8, 1992
U093	All others	Aug. 8, 1990
U094	All	Aug. 8, 1990
U095	Soil & debris	May 8, 1992
U095	All others	Aug. 8, 1990
U096	All	Aug. 8, 1990
U097	Soil & debris	May 8, 1992
U097	All others	Aug. 8, 1990
U098	All	Aug. 8, 1990
U099	All	Aug. 8, 1990
U101	All	Aug. 8, 1990
U102	Soil & debris	June 8, 1991
U102	All others	June 8, 1989
U103	All	Aug. 8, 1990
U105	All	Aug. 8, 1990
U106	All	Aug. 8, 1990
U107	Soil & debris	June 8, 1991
U107	All others	June 8, 1989
U108	All	Aug. 8, 1990
U019	All	Aug. 8, 1990
U110	Soil & debris	May 8, 1992
U110	All others	Aug. 8, 1990
U111	All	Aug. 8, 1990
U112	All	Aug. 8, 1990
U113	All	Aug. 8, 1990
U114	Soil & debris	May 8, 1992
U114	All others	Aug. 8, 1990
U115	All	Aug. 8, 1990
U116	Soil & debris	May 8, 1992
U116	All others	Aug. 8, 1990
U117	All	Aug. 8, 1990
U118	All	Aug. 8, 1990
U118	Soil & debris	May 8, 1992
U118	All others	Aug. 8, 1990
U120	All	Aug. 8, 1990
U121	All	Aug. 8, 1990
U122	All	Aug. 8, 1990
U123	All	Aug. 8, 1990
U124	All	Aug. 8, 1990
U125	All	Aug. 8, 1990
U126	All	Aug. 8, 1990
U127	All	Aug. 8, 1990
U128	All	Aug. 8, 1990
U128	All	Aug. 8, 1990
U130	Soil & debris	May 8, 1992
U130	All others	Aug. 8, 1990
U131	All	Aug. 8, 1990
U132	Soil & debris	May 8, 1992
U132	All others	Aug. 8, 1990
U133	All	Aug. 8, 1990
U134	All	Aug. 8, 1990
U135	All	Aug. 8, 1990

U136	Wastewater	Aug. 8, 1990
U136	Non-wastewater	May 8, 1992
U137	All	Aug. 8, 1990
U138	All	Aug. 8, 1990
U140	All	Aug. 8, 1990
U141	All	Aug. 8, 1990
U142	All	May 8, 1992
U143	Soil & debris	Aug. 8, 1990
U143	All others	Aug. 8, 1990
U144	All	Aug. 8, 1990
U145	All	Aug. 8, 1990
U146	All	Aug. 8, 1990
U147	All	May 8, 1992
U148	Soil & debris	Aug. 8, 1990
U148	All others	May 8, 1992
U148	Soil & debris	Aug. 8, 1990
U148	All others	May 8, 1992
U150	Soil & debris	Aug. 8, 1990
U150	All others	May 8, 1992
U151	High mercury non-wastewater	May 8, 1992
U151	Low mercury non-wastewater	May 8, 1992
U151	Soil & debris	Aug. 8, 1990
U151	All others	Aug. 8, 1990
U152	All	May 8, 1992
U153	Soil & debris	Aug. 8, 1990
U153	All others	Aug. 8, 1990
U154	All	Aug. 8, 1990
U155	All	May 8, 1992
U156	Soil and debris	Aug. 8, 1990
U156	All others	Aug. 8, 1990
U157	All	Aug. 8, 1990
U158	All	Aug. 8, 1990
U159	All	Aug. 8, 1990
U160	All	Aug. 8, 1990
U161	All	Aug. 8, 1990
U162	All	May 8, 1992
U162	Soil and debris	Aug. 8, 1990
U163	All others	May 8, 1992
U163	Soil and debris	Aug. 8, 1990
U164	All others	Aug. 8, 1990
U164	All	Aug. 8, 1990
U165	All	Aug. 8, 1990
U166	All	May 8, 1992
U166	Soil and debris	Aug. 8, 1990
U167	All others	May 8, 1992
U167	Soil and debris	Aug. 8, 1990
U168	All others	Aug. 8, 1990
U168	All	Aug. 8, 1990
U168	All	Aug. 8, 1990
U170	All	May 8, 1992
U171	Soil and debris	Aug. 8, 1990
U171	All others	Aug. 8, 1990
U172	All	May 8, 1992
U173	Soil and debris	Aug. 8, 1990
U173	All others	Aug. 8, 1990
U174	All	May 8, 1992
U176	Soil and debris	Aug. 8, 1990
U176	All others	May 8, 1992
U177	Soil and debris	Aug. 8, 1990
U177	All others	May 8, 1992
U178	Soil & debris	Aug. 8, 1990
U178	All others	Aug. 8, 1990
U178	All	Aug. 8, 1990
U179	All	Aug. 8, 1990
U180	All	Aug. 8, 1990
U181	All	Aug. 8, 1990
U182	All	Aug. 8, 1990
U183	All	May 8, 1992
U184	Soil & debris	Aug. 8, 1990
U184	All others	Aug. 8, 1990
U185	All	Aug. 8, 1990
U186	All	Aug. 8, 1990
U187	All	Aug. 8, 1990
U188	All	Aug. 8, 1990
U189	All	June 8, 1991
U190	Soil & debris	June 8, 1991
U190	All others	May 8, 1992
U191	Soil and debris	Aug. 8, 1990
U191	All others	Aug. 8, 1990
U192	All	May 8, 1992
U193	Soil and debris	Aug. 8, 1990
U193	All others	May 8, 1992
U194	Soil and debris	Aug. 8, 1990
U194	All others	Aug. 8, 1990
U196	All	Aug. 8, 1990
U197	All	May 8, 1992
U200	Soil and debris	Aug. 8, 1990
U200	All others	Aug. 8, 1990
U201	All	May 8, 1992
U202	Soil and debris	

U202	All others	Aug. 8, 1990
U203	All	Aug. 8, 1990
U204	All	Aug. 8, 1990
U206	All	Aug. 8, 1990
U206	Soil and debris	May 8, 1992
U206	All others	Aug. 8, 1990
U207	All	Aug. 8, 1990
U208	All	Aug. 8, 1990
U209	All	Aug. 8, 1990
U210	All	Aug. 8, 1990
U211	All	Aug. 8, 1990
U213	All	Aug. 8, 1990
U214	All	Aug. 8, 1990
U216	All	Aug. 8, 1990
U216	All	Aug. 8, 1990
U217	All	Aug. 8, 1990
U218	Soil and debris	May 8, 1992
U218	All others	Aug. 8, 1990
U219	Soil and debris	May 8, 1992
U219	All others	Aug. 8, 1990
U220	All	Aug. 8, 1990
U221	Soil and debris	June 8, 1991
U221	All others	June 8, 1989
U222	Soil and debris	May 8, 1992
U222	All others	Aug. 8, 1990
U223	Soil and debris	June 8, 1991
U223	All others	June 8, 1989
U226	All	Aug. 8, 1990
U226	All	Aug. 8, 1990
U227	All	Aug. 8, 1990
U228	All	Aug. 8, 1990
U234	Soil and debris	May 8, 1992
U234	All others	Aug. 8, 1990
U236	Soil and debris	June 8, 1991
U236	All others	June 8, 1989
U236	Soil and debris	May 8, 1992
U236	All others	Aug. 8, 1990
U237	Soil and debris	May 8, 1992
U237	All others	Aug. 8, 1990
U238	Soil and debris	May 8, 1992
U238	All others	Aug. 8, 1990
U239	All	Aug. 8, 1990
U240	Soil and debris	May 8, 1992
U240	All others	Aug. 8, 1990
U243	All	Aug. 8, 1990
U244	Soil and debris	May 8, 1992
U244	All others	Aug. 8, 1990
U246	All	Aug. 8, 1990
U247	All	Aug. 8, 1990
U248	All	Aug. 8, 1990
U249	All	Aug. 8, 1990

**JULY 16, 1993**

**LETTER FROM VIRGINIA DEPARTMENT OF WASTE MANAGEMENT TO  
REHRIG INTERNATIONAL**



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

JUL 16 1993

Mr. Paul Bauz, Plating Manager  
Rehrig International  
901 N. Lombardy Street  
Richmond, Virginia 23220

RE: RCRA Compliance Inspection  
EPA ID# VAD089028377

Dear Mr. Bauz:

Thank you for your letter dated June 23, 1993 describing the steps taken to bring your facility into compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). I have completed a review of the information submitted and have made comments on each item below.

1. The new racks added to the less than 90-day accumulation area as shown in the pictures provided with your letter are impressive. These more than satisfy the aisle space requirements of VHWMR §9.2.E. The rapid and thorough corrective actions taken here demonstrate a commendable willingness to make more than minimal improvements to hazardous waste management procedures.
2. Submission of the updated plant layout drawing constitutes proper notification of the Director of all waste accumulation areas.
3. The amendment to the facility contingency plan contains the elements requested.

As a result, your facility has been found to be in compliance with the VHWMR for the May 13, 1993 RCRA Compliance Inspection.

Thank you for your timely response. If I can be of any further assistance please call me at (804) 786-7111.

Sincerely,

Robert Lincoln  
Analytical Chemist

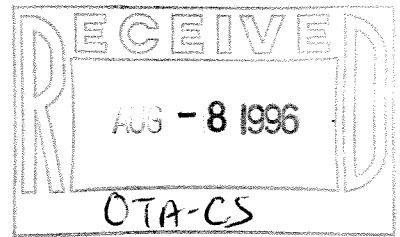
cc: Glenn Moore  
Clair Slaughter  
930713 OCE

James Monroe Building, Eleventh Floor • 101 North Fourteenth Street • Richmond, Virginia 23219

REHRIG INTERNATIONAL  
COMPLIANCE AND ENFORCEMENT

**AUGUST 8, 1996**

**LETTER FROM VIRGINIA DEPARTMENT OF WASTE MANAGEMENT TO  
REHRIG INTERNATIONAL**



**COMMONWEALTH of VIRGINIA**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

George Allen  
Governor

Becky Norton Dunlop  
Secretary of Natural Resources

PIEDMONT REGIONAL OFFICE  
4949-A Cox Road  
Glen Allen, Virginia 23060  
(804) 527-5020  
Fax (804) 527-5106  
<http://www.deq.state.va.us>

Thomas L. Hopkins  
Director

Gerard Seeley, Jr.  
Piedmont Regional Director

**August 6, 1996**

**Mr. Richard Coiner  
Plant Manager  
Rehrig International  
901 Lombardy Street  
Richmond, Virginia 23220**

**RE: RCRA Compliance Inspection, Rehrig International, 901 Lombardy Street,  
Richmond, Virginia 23220. EPA ID# VAR089028377.**

**Dear Mr. Coiner:**

Thank you very much for your cooperation during the Hazardous Waste Compliance Inspection at your facility on July 11, 1996. After assessing the amount of hazardous waste generation by your facility it was determined that Rehrig International is a Large Quantity Generator of hazardous waste.

During the inspection it appeared that your facility as a Large Quantity Generator was not in compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). Such instances are indicated by " \* " marks on the enclosed checklists and are listed below:

**A. RECORD KEEPING:**

1. Hazardous waste manifests had not been received from the TSD facility for hazardous waste which had been shipped over 45 days. This is required under section 6.5.C.1.b. of the VHWMR.

2. The facility had not filed an exception report with the Director of the Department of Environmental Quality for the hazardous waste which was shipped over 45 days where there was no manifest received from the TSD for the shipment. This is required under section 6.5.C.1.b. of the VHWMR.

3. The facility did not have job titles for each position at the facility related to hazardous waste management. This is required under section 9.1.G.4.a. of the VHWMR.

4. The owner/operator has not maintained on file at the facility a record of the results of tank assessments made by a Virginia registered professional engineer. This is required in section 9.9.D.8.c. of the VHWMR.

#### **B. FACILITY SAFETY:**

1. The facility did not have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies. This is required under section 9.2.E. of the VHWMR.

#### **C. USE AND MANAGEMENT OF CONTAINERS FOR 90 DAY ACCUMULATION AREAS:**

1. The generator did not have a record of inspections of the accumulation area at the facility in an inspection log. This is required under section 6.4.E.1.d. and 9.1.F.4. of the VHWMR.

2. The generator did not have containers labeled or marked clearly with the words "Hazardous Waste". This is required under section 6.4.E.1.c. of the VHWMR.

3. All containers holding hazardous waste were not kept closed during storage. This is required under section 9.8.D.1. of the VHWMR.

4. Storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby were not separated by means of dikes, berms, walls, or other devices. This is required under section 9.8.G.3. of the VHWMR.

#### **D. MANAGEMENT OF TANKS FOR HAZARDOUS WASTES:**

1. The secondary containment system is not constructed or lined with materials that are compatible with the waste(s) to be placed in the tank system and of sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions, stress of installation, and the stress of daily operation. This is required under section 9.9.D.3.a. of the VHWMR.

2. The secondary containment system is not provided with a leak detection system that is designed or operated so that it will detect the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours or at the earliest practicable time if the existing detection technology or site conditions will not allow detection of a release within 24 hours. This is required under section 9.9.D.3.c. of the VHWMR.



3. The external liner system for the tanks was not designed to contain 100% of the capacity of the largest tank within its boundary. This is required under section 9.9.D.5.a.(1). of the VHWMR.

4. The external liner system for the facility's tank area was not free of gap as the external liner system is not continuous around the tanks. This is required under section 9.9.D.5.a.(3) of the VHWMR.

5. For other than non-enterable underground tanks and for all ancillary equipment, an annual leak test or other internal inspection was not performed by an independent Virginia registered professional engineer that addresses cracks, leaks corrosion and erosion. This was not performed annually on the facility's tank units. As stated by facility representatives that Tank No. 1, (used for caustic hazardous waste) was not examined by a registered Virginia engineer after repairs were completed for a crack. This is required under section 9.9.8.D.b. of the VHWMR.

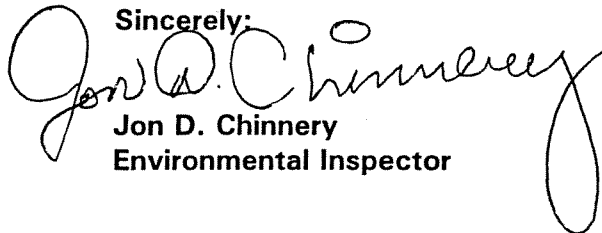
6. Inspections regarding sections 9.9.F.1.(tank inspections to be completed at least once each operating day) were not documented in the facility operating record or log. This is required under section 9.9.F.3. and 9.1.F.4. of the VHWMR.

These issues were discussed with facility representatives during the inspection. Please advise this office within 10 calendar days if this information is incorrect. Please take the appropriate corrective action for items (A through D) to bring your facility into compliance with the VHWMR.

Please provide all appropriate documentation of your corrective measures concerning items A, B, C 1, C. 2, C. 3 within 30 days of receipt of this letter. In regards to item C.4 and D, please provide all documentation of your corrective measures to this office within 90 days of receipt of this letter.

If you have any further questions regarding this matter, please call me at (804) 527-5074.

Sincerely:



Jon D. Chinnery  
Environmental Inspector

Enclosures

cc: file

Claire R. Slaughter, DEQ, OTA, (enclosures)

Cathy P. Franco, Enforcement, DEQ, Piedmont Regional Office

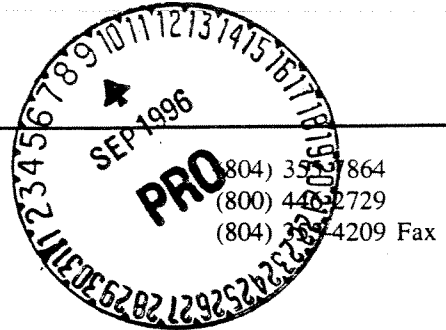
Charley W. Banks, DEQ, Piedmont Regional Office

**SEPTEMBER 4, 1996**

**LETTER FROM REHRIG INTERNATIONAL TO VDEQ**

# REHRIG INTERNATIONAL

901 North Lombardy Street  
Richmond, Virginia 23220



September 4, 1996

Jon D. Chinnery  
Environmental Inspector  
Office of Waste Compliance  
Commonwealth of Virginia  
Department of Environmental Quality  
Piedmont Regional Office  
4949-A Cox Road  
Glen Allen, VA 23060

RE: RCRA Compliance Inspection, Rehrig International, 901 Lombardy Street,  
Richmond, Virginia 23220. EPA ID# VAR089028377

Dear Jon D. Chinnery:

The following corrective actions have taken place with respect to the Hazardous Waste Compliance Inspection at our facility on July 11, 1996.

## A. Record Keeping:

1. Hazardous waste manifests were received from the TSD facilities on 7/24/96 for hazardous waste which has been shipped over 45 days (Section 6.5.C.1.b. of the VHWMR).
2. The facility does not have to file an exception report with the Director of the Department of Environmental Quality due to the 7/24/96 corrective action (Section 6.5.C.1.b. of the VHWMR).
3. The facility completed job titles for each position of the facility related to hazardous waste management on 8/9/96 (Section 9.1.G.4.a. of the VHWMR).
4. The owner operator is contacting a Virginia registered professional engineer to record the results of the tank assessments. The liquid waste in these tanks is being transferred frequently to an offsite TSD facility (Section 9.9.D.8.c. of the VHWMR).

## B. Facility Safety:



THE LEADER IN CONTAINERS SINCE 1913

1. The facility is maintaining adequate aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies (Section 9.2.E. of the VHWMR).

C. Use and Management of Containers for 90 Day Accumulation Areas:

1. The generator has records of inspections of accumulation area at the facility in an inspection log completed 8/9/96 (Sections 6.4.E.1.d. and 9.1.F.4. of the VHWMR).

2. The generator has all containers labeled or marked clearly with the words "Hazardous Waste" on 7/24/96 (Section 6.4.E.1.c. of the VHWMR).

3. All containers of hazardous waste are kept closed during storage on 7/12/96 (Section 9.8.D.1. of the VHWMR).

4. Storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby were not separated by means of dikes (Section 9.8.G.3. of the VHWMR). An outside contractor has been contacted 8/26/96 and is developing a quotation to presented to facility by 9/6/96.

D. Management of Tanks for Hazardous Wastes:

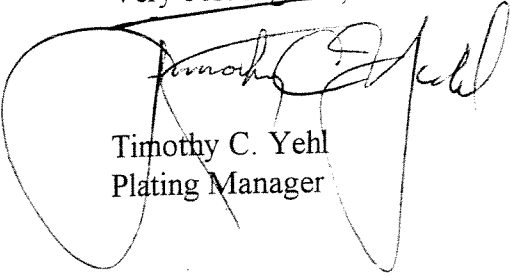
1.,2.,3.,4. An outside contractor has been contacted 8/16/96 and is developing a quotation to be presented to facility by 9/6/96 (Sections 9.9.D.3.a., 9.9.D.3.c., 9.9.D.5.a.(1), 9.9.D.5.a.(3)).

5. We are contacting an outside vendor (independent Virginia registered professional engineer) to provide annual leak test or other internal inspection (Section 9.9.8.D.6. of the VHWMR).

6. Inspections regarding sections 9.9.F.1. were documented starting on 8/9/96 (Sections 9.9.F.3 and 9.1.F.4 of the VHWMR).

We would like to arrange a followup inspection to verify the completion of the corrective action.. I will be in contact with you on Friday, 9/6/96 to arrange a time for the visit.

Very best regards,



Timothy C. Yehl  
Plating Manager

# REHRIG INTERNATIONAL

901 North Lombardy Street  
Richmond, Virginia 23220

(804) 355-7864  
(800) 446-2729  
(804) 355-4209 Fax

September 4, 1996

Jon D. Chinnery  
Environmental Inspector  
Office of Waste Compliance  
Commonwealth of Virginia  
Department of Environmental Quality  
Piedmont Regional Office  
4949-A Cox Road  
Glen Allen, VA 23060

RE: RCRA Compliance Inspection; Rehrig International, 901 Lombardy Street,  
Richmond, Virginia 23220. EPA ID# VAR089028377

Dear Jon D. Chinnery:

The following corrective actions have taken place with respect to the Hazardous Waste Compliance Inspection at our facility on July 11, 1996.

A. Record Keeping:

✓ ☒ Hazardous waste manifests were received from the TSD facilities on 7/24/96 for hazardous waste which has been shipped over 45 days (Section 6.5.C.1.b. of the VHWMR). *oh*

✓ ☒ The facility does not have to file an exception report with the Director of the Department of Environmental Quality due to the 7/24/96 corrective action (Section 6.5.C.1.b. of the VHWMR). *oh*

✓ ☒ The facility completed job titles for each position of the facility related to hazardous waste management on 8/9/96 (Section 9.1.G.4.a. of the VHWMR). *8-8-96*

4. The owner operator is contacting a Virginia registered professional engineer to record the results of the tank assessments. The liquid waste in these tanks is being transferred frequently to an offsite TSD facility (Section 9.9.D.8.c. of the VHWMR). *10-29-96* *no days*

B. Facility Safety:



THE LEADER IN CONTAINERS SINCE 1913

13.1 The facility is maintaining adequate aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies (Section 9.2.E. of the VHWMR).

C. Use and Management of Containers for 90 Day Accumulation Areas:

✓ ~~1.~~ The generator has records of inspections of accumulation area at the facility in an inspection log completed 8/9/96 (Sections 6.4.E.1.d. and 9.1.F.4. of the VHWMR).

✓ 2. The generator has all containers labeled or marked clearly with the words "Hazardous Waste" on 7/24/96 (Section 6.4.E.1.c. of the VHWMR).

✓ 3. All containers of hazardous waste are kept closed during storage on 7/12/96 (Section 9.8.D.1. of the VHWMR).

✓ 4. Storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby were not separated by means of dikes (Section 9.8.G.3. of the VHWMR). An outside contractor has been contacted 8/26/96 and is developing a quotation to presented to facility by 9/6/96.

D. Management of Tanks for Hazardous Wastes:

✓ 1.,2.,3.,4. An outside contractor has been contacted 8/16/96 and is developing a quotation to be presented to facility by 9/6/96 (Sections 9.9.D.3.a., 9.9.D.3.c., 9.9.D.5.a.(1), 9.9.D.5.a.(3)).

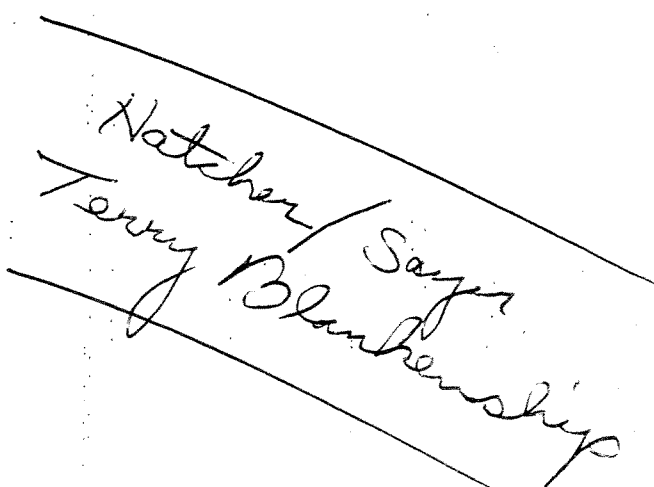
✓ 5. We are contacting an outside vendor (independent Virginia registered professional engineer) to provide annual leak test or other internal inspection (Section 9.9.8.D.6. of the VHWMR).

~~6.~~ Inspections regarding sections 9.9.F.1. were documented starting on 8/9/96 (Sections 9.9.F.3 and 9.1.F.4 of the VHWMR).

We would like to arrange a followup inspection to verify the completion of the corrective action. I will be in contact with you on Friday, 9/6/96 to arrange a time for the visit.

Very best regards,

  
Timothy C. Yeh  
Planting Manager

  
Hatcher/Sayer  
Terry Blankenship

**R. C. Hegamper**

P.O. BOX 1086  
MECHANICSVILLE, VA 23111

1 Sept 1996

Rehrig International  
109 N. Lombardy st.  
Richmond, Virginia

Pre-bid submittal of plans to provide secondary barriers for  
5 acid/alkaline FRP holdings in plating tank farm.

- 1) Fabricate FRP open top vessels 3' in  $\phi$  larger than existing vessels.
- 2) Height of each barrier vessel be such that capacity of barrier will be equal to inner vessel plus 5%.
- 3) Each barrier vessel will have one manhole sufficient in size to allow removal of inner manhole.
- 4) Each barrier vessel will be of vinyl ester resin with glass filament re-enforcing.
- 5) Each barrier vessel will be field constructed of a base circle bottom with two side sections.
- 6) inner vessele will rest on  $\frac{1}{2}$ " foam.

Construction procedures, pricing, and scheduling will be covered in the actual bid package. please look over this submittal and offer any comments that you may have.

Sincerely,

*R.C. Hegamper*  
R. C. Hegamper





9/26/96

SEP-16-1996 17:16 FROM



COMMONWEALTH of VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen  
Governor

Becky Norton Dunlop  
Secretary of Natural Resources

PIEDMONT REGIONAL OFFICE

4949-A Cox Road  
Glen Allen, Virginia 23060  
(804) 527-5020  
Fax (804) 527-5106  
<http://www.deq.state.va.us>

Thomas L. Hopkins  
Director

Gerard Seeley, Jr.  
Piedmont Regional Director

August 6, 1996

Mr. Richard Coiner  
Plant Manager  
Rehrig International  
901 Lombardy Street  
Richmond, Virginia 23220

RE: RCRA Compliance Inspection, Rehrig International, 901 Lombardy Street,  
Richmond, Virginia 23220. EPA ID# VAR089028377.

Dear Mr. Coiner:

Thank you very much for your cooperation during the Hazardous Waste Compliance Inspection at your facility on July 11, 1996. After assessing the amount of hazardous waste generation by your facility it was determined that Rehrig International is a Large Quantity Generator of hazardous waste.

During the inspection it appeared that your facility as a Large Quantity Generator was not in compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). Such instances are indicated by " \* " marks on the enclosed checklists and are listed below:

A. RECORD KEEPING:

1. Hazardous waste manifests had not been received from the TSD facility for hazardous waste which had been shipped over 45 days. This is required under section 6.5.C.1.b. of the VHWMR.

2. The facility had not filed an exception report with the Director of the Department of Environmental Quality for the hazardous waste which was shipped over 45 days where there was no manifest received from the TSD for the shipment. This is required under section 6.5.C.1.b. of the VHWMR.

*Corrected*  
3. The facility did not have job titles for each position at the facility related to hazardous waste management. This is required under section 9.1.G.4.a. of the VHWMR.

→ 4. The owner/operator has not maintained on file at the facility a record of the results of tank assessments made by a Virginia registered professional engineer. This is required in section 9.9.D.8.c. of the VHWMR.

#### B. FACILITY SAFETY:

*Corrected*  
1. The facility did not have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies. This is required under section 9.2.E. of the VHWMR.

#### C. USE AND MANAGEMENT OF CONTAINERS FOR 90 DAY ACCUMULATION AREAS:

*Corrected*  
1. The generator did not have a record of inspections of the accumulation area at the facility in an inspection log. This is required under section 6.4.E.1.d. and 9.1.F.4. of the VHWMR.

*Corrected*  
2. The generator did not have containers labeled or marked clearly with the words "Hazardous Waste". This is required under section 6.4.E.1.c. of the VHWMR.

*Corrected*  
3. All containers holding hazardous waste were not kept closed during storage. This is required under section 9.8.D.1. of the VHWMR.

→ 4. Storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby were not separated by means of dikes, berms, walls, or other devices. This is required under section 9.8.G.3. of the VHWMR.

#### D. MANAGEMENT OF TANKS FOR HAZARDOUS WASTES:

→ 1. The secondary containment system is not constructed or lined with materials that are compatible with the waste(s) to be placed in the tank system and of sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions, stress of installation, and the stress of daily operation. This is required under section 9.9.D.3.a. of the VHWMR.

→ 2. The secondary containment system is not provided with a leak detection system that is designed or operated so that it will detect the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours or at the earliest practicable time if the existing detection technology or site conditions will not allow detection of a release within 24 hours. This is required under section 9.9.D.3.c. of the VHWMR.

→ 3. The external liner system for the tanks was not designed to contain 100% of the capacity of the largest tank within its boundary. This is required under section 9.9.D.5.a.(1). of the VHWMR. 500

→ 4. The external liner system for the facility's tank area was not free of gap as the external liner system is not continuous around the tanks. This is required under section 9.9.D.5.a.(3) of the VHWMR. 500

→ 5. For other than non-enterable underground tanks and for all ancillary equipment, an annual leak test or other internal inspection was not performed by an independent Virginia registered professional engineer that addresses cracks, leaks corrosion and erosion. This was not performed annually on the facility's tank units. As stated by facility representatives that Tank No. 1, (used for caustic hazardous waste) was not examined by a registered Virginia engineer after repairs were completed for a crack. This is required under section 9.9.D.b. of the VHWMR. 1000  
500

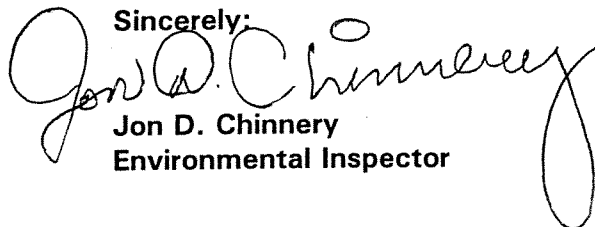
Corrected → 6. Inspections regarding sections 9.9.F.1.(tank inspections to be completed at least once each operating day) were not documented in the facility operating record or log. This is required under section 9.9.F.3. and 9.1.F.4. of the VHWMR. 250

These issues were discussed with facility representatives during the inspection. Please advise this office within 10 calendar days if this information is incorrect. Please take the appropriate corrective action for items (A through D) to bring your facility into compliance with the VHWMR.

Please provide all appropriate documentation of your corrective measures concerning items A, B, C 1, C. 2, C. 3 within 30 days of receipt of this letter. In regards to item C.4 and D, please provide all documentation of your corrective measures to this office within 90 days of receipt of this letter.

If you have any further questions regarding this matter, please call me at (804) 527-5074.

Sincerely:

  
Jon D. Chinnery  
Environmental Inspector

Enclosures

cc: file

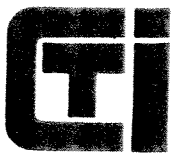
Claire R. Slaughter, DEQ, OTA, (enclosures)

Cathy P. Franco, Enforcement, DEQ, Piedmont Regional Office

Charley W. Banks, DEQ, Piedmont Regional Office

**SEPTEMBER 23, 1996**

**LETTER FROM CTI CONSULTANTS, INC. TO REHRIG INTERNATIONAL**



CONSULTANTS, INC.

905-B SOUTHLAKE BOULEVARD  
RICHMOND, VA 23236  
(804) 897-1087

FAX: (804) 897-0065  
**CONFIDENTIAL**

September 23, 1996

Mr. Kenny Cullingsworth  
**REHRIG INTERNATIONAL**  
901 N. Lombardy Street  
Richmond, Virginia 23230  
(804) 355-7864 x143  
(fax) 354-0618

RE: Proposal/Work Scope for Visual  
Inspection of Fiberglass Tanks Located  
in Richmond, Virginia

Dear Mr. Cullingsworth:

Please accept our reply to your request of September 17, 1996, for non-destructive interior inspection of several fiberglass tanks located at your Richmond, Virginia plant. In accordance with your instructions, we propose to conduct a visual inspection of the interiors and exteriors, augmented by a photographic record. A summary of the proposed testing follows and an Estimate of Costs is attached.

We propose to supply the equipment, personnel and expertise required to properly evaluate the applicable areas of the tanks. The project would be performed in a timely manner under the direction of our **entry supervisor**. It is our understanding that the tanks are located in the same building and we would have adequate access to all of them. In addition, the tanks should be drained of contents, cleaned of debris and dried by others prior to our arrival. It is not expected that any grinding or wire-brushing sediment, corrosion products, sludge or scale from the tanks' interior would be required. If necessary, these services would be provided at an additional cost. Electrical service must be available within a practical range and our personnel would provide the necessary safety equipment required for tank entry. These would include, but are not limited to, an oxygen/flammability/toxic gas indicator, mechanical ventilation, ground-fault circuit interrupter and an auxiliary self-contained air supply. Please note that confined space entry is recognized by our industry as potentially hazardous. Should an accident occur that requires medical attention, we would rely on your in-house medical facilities or the local fire department for assistance.



CONSULTANTS, INC. 2

We feel that the inspection of the tanks could begin on 2 weeks notice and once the data was collected and analyzed, a report would be available in about 10 days. However, we will work with you in every way possible to provide you with the required information within your deadline. Although charges may vary either up or down depending on the actual circumstances encountered, we have attached an estimate of the charges relative to our involvement with this project.

If the terms of this proposal are acceptable to you and they satisfactorily set forth your understanding of the arrangement between us, we would appreciate your signing the enclosed copy of this letter in the space provided and returning it to us. We look forward to hearing from you.

Sincerely,

**CTI Consultants, Inc.**

A handwritten signature in dark ink, appearing to read "C.A. Workman", with a long horizontal flourish extending to the right.

Christopher A. Workman, P.E.  
Richmond Branch Manager

CAW/cw  
Enclosures

Accepted this \_\_\_\_\_ day of \_\_\_\_\_, 1996

By: \_\_\_\_\_

Enclosures



September 23, 1996

### COST ESTIMATE FOR INTERIOR EXAMINATION OF 2 FIBERGLASS TANKS

8 Hours at \$ 95 per hour . . . . .	\$ 760.00
35mm Photographic Services . . . . .	\$ 70.00
Travel Time . . . . .	<b>no charge</b>
Mileage . . . . .	<b>no charge</b>
Reporting of Results:	
4 Hours at \$ 65 per hour . . . . .	\$ 260.00
Rental of Applicable Safety Equipment <b>per day</b> . . . . .	<u>\$ 759.00</u>
Total Estimated Charges Involved in This Project . . . . .	\$ 1849.00
Cost per tank . . . . .	\$ 925.00*

It is our understanding that our involvement in this project may be expanded or reduced, depending on the actual circumstances encountered at the plant and input from you. Services required in excess of the above would be charged at a unit overtime rate of 1.3. Any known changes affecting this estimate should be discussed prior to our arrival at the site. Our estimate of charges would reflect these changes.

\* - It is believed that we can inspect 2 tanks per day (portal-to-portal). If more tanks are included in the project, a substantial savings per tank can be obtained.

Proposed Personnel Assigned To This Project: Chris Workman, Entry Supervisor  
Al Lambeth, Entrant, NDT Assistant



**OCTOBER 3, 1996**

**LETTER FROM COMMONWEALTH OF VIRGINIA DEPARTMENT OF  
ENVIRONMENTAL QUALITY TO REHRIG INTERNATIONAL**



**COMMONWEALTH of VIRGINIA**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

George Allen  
Governor

Becky Norton Dunlop  
Secretary of Natural Resources

**PIEDMONT REGIONAL OFFICE**

4949-A Cox Road  
Glen Allen, Virginia 23060  
(804) 527-5020  
Fax (804) 527-5106  
<http://www.deq.state.va.us>

Thomas L. Hopkins  
Director

Gerard Seeley, Jr.  
Piedmont Regional Director

**October 3 , 1996**

**Mr. Richard Coiner**  
**Plant Manager**  
**Rehrig International**  
**901 Lombardy Street**  
**Richmond, Virginia 23220**

**RE: RCRA Compliance Inspection, Rehrig International, 901 Lombardy Street, Richmond, Virginia 23220. EPA ID# VAR089028377.**

**Dear Mr. Coiner:**

I am in receipt of a letter from Timothy Yehl (Plating Manager) dated September 4, 1996. I have noted the areas of concern from our follow up inspection of your facility on September 16, 1996.

**A. RECORD KEEPING:**

1.) Hazardous waste manifests have not been received from the TSD facility for hazardous waste which had been shipped over 45 days.

aa.) The facility was able to provide copies of all hazardous waste manifests for the years 1994, 1995 & 1996. These manifests were reviewed and contained the TSD facility representative signature for receiving the hazardous waste. This complies with Section 6.5.C.1.b. of the VHWMR.

2.) The facility had not filed an exception report with the Director of the Department of Environmental Quality for the hazardous waste which was shipped over 45 days where there was no manifest received from the TSD for the shipment.

aa.) The facility was able to provide the manifests with signatures from the TSD facility representative within the 45 day period. This complies with Section 6.5.C.1.b. of the VHWMR.

3.) The facility did not have job titles for each position at the facility related to hazardous waste management.

aa.) The facility was able to provide a list of job titles of positions currently filled by facility personnel who provide hazardous waste management for the facility. This complies with Section 9.1.G.4.a. of the VHWMR.

#### **B. FACILITY SAFETY:**

1.) The facility did not have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment during emergencies.

aa.) During the (physical observation) follow-up inspection on September 16, 1996 it was noted by inspectors that all aisle ways at or near the points of hazardous waste generation and the accumulation areas were clear and unobstructed. This complies with Section 9.9.D.8.c. of the VHWMR.

#### **C. USE AND MANAGEMENT OF CONTAINERS FOR 90 DAY ACCUMULATION AREAS:**

1.) The generator did not have a log of inspections of the accumulation area at the facility in an inspection log.

aa.) It was discussed during the follow-up inspection with facility representatives, that certain changes would have to be made in the language regarding the inspection log currently being used at the facility. A copy of the amended log was received on September 16, 1996 from Timothy Yehl (Plating Manager). This log contained the amended language and is attached to the inspection report. This complies with Section 6.4.E.1.d. and 9.1.F.4. of the VHWMR.

2.) The generator did not have containers labelled or marked clearly with the words "Hazardous Waste".

aa.) Upon inspection of the facility on September 16, 1996 inspectors noted that all containers containing hazardous waste were properly labelled with the words "Hazardous Waste". This complies with Section 6.4.E.1.c. of the VHWMR.

3.) All containers holding hazardous waste were not kept closed during storage.

aa.) During the follow-up inspection of September 16, 1996, it was noted by inspectors that all containers containing hazardous waste were closed. In the case of satellite containers proper bungs on the drums were in place. This complies with Section 9.8.D.1. of the VHWMR.

4.) Storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby were not separated by means of dikes, berms, walls, or other devices.

aa.) During the follow-up inspection of September 16, 1996 it was noted by inspectors that containers holding hazardous waste incompatible with other materials were separated by means of a completed berm around the holding area. This complies with Section 9.8.G.3. of the VHWMR.

**D. MANAGEMENT OF TANKS FOR HAZARDOUS WASTE:**

6.) Inspections regarding sections 9.9.F.1. (tank inspections to be completed at least once each operating day) were not documented in the facility operating record or log.

aa.) The generator was able to produce a log which listed tank inspection maintained on a log starting on August 9, 1996. This complies with Section 9.9.F.3. and 9.1.F.4. of the VHWMR.

The follow-up inspection of September 16, 1996 noted that many areas of the facility have been brought back into compliance. A number of areas remain out of compliance. Cathie Franco of our enforcement section will work with you to develop a formal schedule for corrective action. Items outstanding are listed below.

**A. RECORD KEEPING:**

4.) The owner/operator has not maintained on file at the facility a record of the results of tank assessments made by a Virginia registered professional engineer. This is required under Section 9.9.D.8.c. of the VHWMR.

**D. MANAGEMENT OF TANKS FOR HAZARDOUS WASTES:**

1.) The secondary containment system is not constructed or lined with materials that are compatible with the waste(s) to be placed in the tank system and of sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions, stress of installation, and the stress of daily operation. This is required under Section 9.9.D.3.a. of the VHWMR.

2.) The secondary containment system is not provided with a leak detection system that is designed or operated so that it will detect the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours or at the earliest practicable time if the existing detection technology or site conditions will not allow detection of a release within 24 hours. This is required under Section 9.9.D.3.c. of the VHWMR.

3.) The external liner system for the tanks was not designed to contain 110% of the capacity of the largest tank within its boundary. This is required under Section 9.9.D.5.a.(1) of the VHWMR.

4.) The external liner system for the facility's tank area was not free of gap as the external liner system is not continuous around the tanks. This is required under Section 9.9.D.5.a.(3) of the VHWMR.

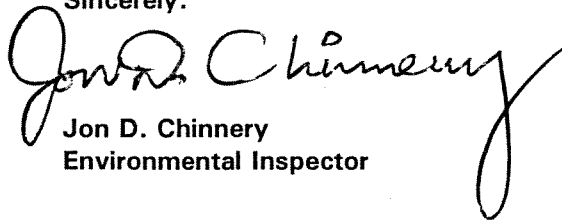
5.) For other than non-enterable underground tanks and for all ancillary equipment, an annual leak test or other internal inspection was not performed by an independent Virginia registered professional engineer that addresses cracks, leaks, corrosion and erosion. This was not performed annually on the facility's tank units. Facility representatives stated that Tank No. 1, (used for caustic hazardous waste) was not examined by a registered Virginia engineer after repairs were completed for a crack. This is required under Section 9.9.8.D.b. of the VHWMR.

page 4 of 4.

These issues were discussed with facility representatives during the inspection of July 11, 1996 and the follow-up inspection of September 16, 1996. Cathie Franco will contact you regarding these outstanding issues.

If you have any further questions regarding this matter, please call me at (804) 527-5074 or Cathie Franco at (804) 527-5081.

Sincerely:

A handwritten signature in black ink, appearing to read "Jon D. Chinnery". The signature is fluid and cursive, with a large loop at the end of the last name.

Jon D. Chinnery  
Environmental Inspector

Enclosures

cc: file

Cathy P. Franco, Enforcement, DEQ, Piedmont Regional Office  
Charley W. Banks, DEQ, Piedmont Regional Office

**DECEMBER 17, 1996**

**VIRGINIA WASTE MANAGEMENT BOARD CONSENT ORDER**

clawie



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen  
Governor

Becky Norton Dunlop  
Secretary of Natural Resources

### PIEDMONT REGIONAL OFFICE

4949-A Cox Road  
Glen Allen, Virginia 23060  
(804) 527-5020  
Fax (804) 527-5106  
<http://www.deq.state.va.us>

Thomas L. Hopkins  
Director

Gerard Seeley, Jr.  
Piedmont Regional Director

### VIRGINIA WASTE MANAGEMENT BOARD CONSENT ORDER

Re: Rehrig International  
EPA ID NO. VAD089028377

#### SECTION A: PREAMBLE AND AUTHORITY

This is an Enforcement Order ("Order") issued by the Virginia Waste Management Board ("Board") to Rehrig International ("Rehrig"). This Order is issued by the Board, through the Director ("Director") of the Department of Environmental Quality ("DEQ"), pursuant to the authority granted to the Board and the Director under §§ 10.1-1182 to -1192, -1402, -1405, and -1455 of the Code of Virginia (1950), as amended ("Virginia Code").

Pursuant to 42 U.S.C. § 6926, the United States Environmental Protection Agency ("EPA") has granted the Commonwealth of Virginia interim and final authorization to administer and enforce its hazardous waste program (Phase I and Phase II Components A and B) in lieu of the federal hazardous waste program, as published in the Federal Register on November 3, 1981, August 17, 1983, and December 4, 1984.

#### SECTION B: FINDINGS

1. Rehrig is a manufacturer of grocery shopping carts and shopping baskets located at 901 Lombardy Street, Richmond, VA.
2. Rehrig filed a "Notification of Hazardous Waste Activity" with EPA on November 4, 1980, declaring Rehrig to be a generator of hazardous waste listed or identified under Title 40, Code of Federal Regulations, Part 261. The operations generate the following waste streams: F006 and D007. The waste produced is stabilized waste sludge from the nickel trichrome plating process.

3. On July 11, 1996, DEQ staff conducted a Compliance Evaluation Inspection ("CEI") at Rehrig. Following the CEI, DEQ sent Rehrig a Notice of Violation letter alleging the following violations:

- a. Hazardous waste manifests had not been received from the TSD facility for hazardous waste which had been shipped over 45 days and no exception report had been filed with the Director 9 VAC 20-60-380.C.1.b. (formerly § 6.5.C.1.b. of the VHWMR);
- b. Failure to have job titles for each position at the facility related to hazardous waste management 9 VAC 20-60-530.G.4.a (§ 9.1.G.4.a.);
- c. Failure to maintain on file at the facility a record of the results of tank assessments made by a Virginia registered professional engineer 9 VAC 20-60-610.D.8.c. (§ 9.9.D.8.c.);
- d. Failure to maintain adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies 9 VAC 20-60-540.E. (§ 9.2.E.);
- e. Failure to have a record of inspections of the accumulation area at the facility in an inspection log 9 VAC 20-60-370.E.1.d., 9 VAC 20-60-530.F. (§§ 6.4.E.1.d., 9.1.F.4);
- f. Failure to have containers labeled or marked clearly with the words "Hazardous Waste" 9 VAC 20-60-370.E.1.c. (§ 6.4.E.1.c.);
- g. Failure to keep all containers holding hazardous waste closed during storage 9 VAC 20-60-600.D.1. (§ 9.8.D.1.);
- h. Failure to store containers holding hazardous wastes which are incompatible with any materials, or other hazardous wastes stored nearby, separated by means of dikes, berms, wall, or other devices 9 VAC 20-60-600.G.3. (§ 9.8.G.3.);
- i. The secondary containment system is not constructed or lined with materials that are compatible with the waste(s) to be placed in the tank system and of sufficient strength and thickness to prevent failure



due to pressure gradients, physical contact with the waste, climatic conditions, stress of installation, and the stress of daily operation 9 VAC 20-60-610.D.3.a. (§ 9.9.D.3.a.)

- j. The secondary containment system is not provided with a leak detection system that is designed or operated so that it will detect the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours or at the earliest practicable time 9 VAC 20-60-610.D.3.c. (§ 9.9.D.3.c.);
- k. The external liner system for the tanks was not designed to contain 100% of the capacity of the largest tank within its boundary 9 VAC 20-60-610.D.5.a.(1) (§ 9.9.D.5.a.(1));
- l. The external liner system for the facility's tank area was not free of gap as the external liner system is not continuous around the tanks 9 VAC 20-60-610.D.5.a.(3) (§ 9.9.D.5.a.(3));
- m. For other than non-enterable underground tanks and for all ancillary equipment, an annual leak test or other internal inspection was not performed by an independent Virginia registered professional engineer that addresses cracks, leaks, corrosion, and erosion 9 VAC 20-60-610.D.8.b (§ 9.9.D.8.b); and
- n. Failure to document daily tank inspections in the facility operating record or log 9 VAC 20-60-610.F.3., 9 VAC 20-60-530.F.4 (§§ 9.9.F.3, 9.1.F.4.)

4. As a result of Rehrig's correspondence dated September 4, 1996, and a follow up inspection of the facility conducted on September 16, 1996, the following areas noted in paragraph 3 above have been returned to compliance: Paragraph 3.a.; 3.b.; 3.d; 3.e.; 3.f.; 3.g.; 3.h; and 3.n. Certain items noted in paragraph 3 above remain out of compliance; however, Rehrig is actively working to bring these items back into compliance: 3.c.; 3.i.; 3.j.; 3.k.; 3.l.; and 3.m.

#### SECTION C: ORDER

As a result of an informal conference on November 26, 1996, between representatives of Rehrig and DEQ, and subsequent discussions and correspondence between the parties, Rehrig and DEQ, after due consideration, enter into this Order in voluntary

resolution of the violations noted in Section B.

Therefore, in order to ensure that Rehrig takes appropriate and timely action to meet its obligations, the Board, through the Director, hereby ORDERS, and Rehrig agrees to comply with, the Schedule of Compliance in Appendix A, which is incorporated herein by reference.

#### SECTION D: ADMINISTRATIVE PROVISIONS

1. For the purpose of this proceeding, Rehrig does not contest the jurisdictional and factual allegations contained herein.
2. For the purpose of this proceeding, Rehrig waives the right to request further hearing on any issue of fact or law herein and consents to the terms and issuance of this Order.
3. For the purposes of this proceeding, and for any future proceeding to enforce the terms of this Order, Rehrig admits that fair and due process under the Administrative Process Act, Virginia Code §§ 9-6.14:1 to :25, has been received in the issuance of this Order.
4. This Order shall remain in effect as follows:
  - a. The requirements imposed in Appendix A will terminate upon completion of the action required.
  - b. This Order shall remain in effect until terminated in writing by the Director. Rehrig may petition the Director to terminate this Order one (1) year after Rehrig has completed the requirements contained herein.
  - c. The Director may terminate this Order upon a finding that Rehrig has violated one or more of the provisions contained in this Order, has violated the VHWMR, or has violated the Virginia Waste Management Act. Rehrig acknowledges that failure to comply with the terms of this Order may subject it to additional enforcement action by the Board or the Department. Such action may include issuance of a special order as authorized by §§ 10.1-1182 and 10.1-1186 of the Code, including imposition of up to \$10,000 in penalties.
5. Termination of this Order, or of any obligation imposed in this Order, shall not operate to relieve Rehrig from its obligation to comply with any statute, regulation, permit condition, other order, certification, standard, or requirement otherwise applicable.

6. Rehrig shall be responsible for compliance with all of the terms and conditions of this Order unless Rehrig can show that compliance is made impossible by a circumstance set forth in § 10.1-1406 of the Code, an act of God, an act of war, an act or omission of a third party so long as Rehrig took precautions against foreseeable acts or omissions, or any combination of the preceding. Rehrig must demonstrate that compliance could not have been achieved through careful management of the waste and that Rehrig has made a good faith effort to comply with this Order.

7. Rehrig shall notify the Director, in writing, when circumstances are anticipated to occur, are occurring, or have occurred, that may delay compliance with, or cause noncompliance with, any requirement of this Order. Such notice shall state:

- a. the reasons for the delay or noncompliance;
- b. the projected duration of such delay or noncompliance;
- c. the measures taken and to be taken to prevent or minimize such delay or noncompliance; and
- d. the time table by which such measures will be implemented and the date full compliance will be achieved.

Failure to so notify the Director shall constitute a waiver of any claim of inability to comply with a requirement of this Order.

8. If any provision of this Order is found to be unenforceable for any reason, the remainder of the Order shall remain in full force and effect.

9. This Order is binding on the parties hereto, their successors in interest, designees, and assigns, jointly and severally.

10. This Order addresses and resolves only the violations cited herein relating to the management and storage of hazardous waste. Issuance of this Order shall not preclude the Board or the Director from seeking subsequent necessary remediation, as otherwise authorized by law. Any subsequent remediation will be subject to the provisions of the Administrative Process Act, including §§ 9-6.14:11 and :12 of the Code.

11. This Order is issued by the Virginia Waste Management Board, and does not affect the authority of the State Air Pollution Control Board or the State Water Control Board.

Consent Order  
Rehrig International  
Page 6

12. This Order shall become effective upon execution by both the Director (or his designee) and an authorized agent of Rehrig.

Consent Order  
Rehrig International  
Page 7

This is an Order of the Virginia Waste Management Board and the Director of the Department of Environmental Quality in accordance with §§ 10.1-1182 to -1192, and -1455 of the Code of Virginia (1950), as amended.

Thomas L. Hopkins  
Thomas L. Hopkins, Director  
Department of Environmental Quality

Commonwealth of Virginia  
City/County of Henrico

The foregoing instrument was acknowledged before me by  
Gerard Seely, Jr., this 23<sup>rd</sup> day of January, 1997.

Catherine P. Franco  
Notary Public

My Commission Expires: May 31, 2000  
Date

Seen and Agreed to:

AR Kern  
Rehrig International

12/17/96  
Date

Commonwealth of Virginia  
County/City of Richmond

The foregoing instrument was acknowledged before me by  
Alan R. Kern, on behalf of Rehrig, International,  
this 17 day of December, 1996.

My Commission Expires:

6/30/99  
Date

Katherine A. Meade-John  
Notary Public

## APPENDIX A

### SCHEDULE OF COMPLIANCE

Re: Rehrig International  
EPA ID NO. VAD089028377

1. Within ninety (90) days of the effective date of this Order, Rehrig shall maintain on file at the facility a record of the results of tank assessments made by a Virginia registered professional engineer in accordance with 9 VAC 20-60-610.D.8.c. (§ 9.9.D.8.c.)

2. Within ninety (90) days of the effective date of this Order, the secondary containment system shall be constructed or lined with materials that are compatible with the waste(s) to be placed in the tank system and of sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions, stress of installation, and the stress of daily operation in accordance with 9 VAC 20-60-610.D.3.a. (§ 9.9.D.3.a.)

3. Within ninety (90) days of the effective date of this Order, the secondary containment system shall be provided with a leak detection system that is designed or operated so that it will detect the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours or at the earliest practicable time in accordance with 9 VAC 20-60-610.D.3.c. (§ 9.9.D.3.c.)

4. Within ninety (90) days of the effective date of this Order, the external liner system for the tanks shall be designed to contain 100% of the capacity of the largest tank within its boundary in accordance with 9 VAC 20-60-610.D.5.a.(1) (§9.9.D.5.a.(1))

5. Within ninety (90) days of the effective date of this Order, the external liner system for the facility's tank area shall be free of gap and the external liner system shall be continuous around the tanks in accordance with 9 VAC 20-60-610.D.5.a.(3) (§ 9.9.D.5.a.(3))

6. Within ninety (90) days of the effective date of this Order, for other than non-enterable underground tanks and for all ancillary equipment, an annual leak test or other internal inspection shall be performed by an independent Virginia registered professional engineer that addresses cracks, leaks, corrosion, and erosion, and such test shall be performed annually hereafter in accordance with 9 VAC 20-60-610.D.8.b. (§ 9.9.D.8.b.)

Schedule of Compliance  
Rehrig International  
Page 2

7. Within thirty (30) days of the effective date of this Order, Rehrig shall deliver to DEQ a check in the amount of \$4,690.00 made payable to the Virginia Department of Environmental Quality. On the check, please note that the check is for payment of a civil charge pursuant to the Order. This amount shall be in voluntary resolution of the violations of the VHWMR noted herein, in accordance with 9 VAC 20-60-80.D.5. (§ 2.7.D.5. of the VHWMR.) Rehrig shall mail the check to the following address:

Virginia Department of Environmental Quality  
P.O. Box 10150  
Richmond, Virginia 23240  
Attn.: Fiscal Office



**MARCH 17, 1997**

**LETTER FROM VIRGINIA DEPARTMENT OF WASTE MANAGEMENT TO  
REHRIG INTERNATIONAL**



COMMONWEALTH of VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen  
Governor

Becky Norton Dunlop  
Secretary of Natural Resources

PIEDMONT REGIONAL OFFICE

4949-A Cox Road  
Glen Allen, Virginia 23060  
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Fax (804) 527-5106  
<http://www.deq.state.va.us>

Thomas L. Hopkins  
Director

Gerard Seeley, Jr.  
Piedmont Regional Director

March 17, 1997

Mr. Richard Coiner  
Plant Manager  
Rehrig International  
901 N. Lombardy Street  
Richmond, Virginia 23220

RE: RCRA Compliance Inspection, Rehrig International, 901 N. Lombardy Street, Richmond, Virginia 23220. EPA ID# VAD 089028377.

Dear Mr. Coiner:

Thank you very much for your cooperation during the follow-up inspection of your facility which was conducted on March 6, 1997. This inspection included all areas of the facility which are involved in hazardous waste management. This follow-up inspection focused on the area of Management of Tanks for Hazardous Waste.

Since the initial inspection on July 11, 1996, there has been much correspondence back and forth between myself and members of your staff. This also included follow-up inspections on September 16, 1996 and November 26, 1996. I have reviewed all the materials which I received from you and your staff in regards to the inspection of your facility on July 11, 1996. After review of the information you and your staff have provided, I am satisfied that you have corrected all the items in Sections A, B, C, & D which were noted in my letter dated August 6, 1996 and October 3, 1996. Based on this information, I am confident that your facility is now in compliance with the Virginia Hazardous Waste Management Regulations (VHWMR).

I have addressed each violation below, noting how and when compliance was achieved for each of the violations:

**A. RECORD KEEPING:**

1. Hazardous waste manifests had not been received from the TSD facility for hazardous waste which had been shipped over 45 days, and the facility had not filed an exception report with the Director of the Department of Environmental Quality for the hazardous waste which was shipped over 45 days where there was no manifest received from the TSD facility for the shipment. This is required under Section 6.5.C.1.b. of the VHWMR.

Action Taken: The facility was able to provide copies of all hazardous waste manifests for the years 1994, 1995 & 1996. These manifests were reviewed during the follow-up inspection on September 14, 1996, and contained the TSD facility representative signature for receiving the generated hazardous waste. This complies with Section 6.5.C.1.b. of the VHWMR.

2. The facility did not have job titles for each position at the facility related to hazardous waste management. This is required under Section 9.1.G.4.a. of the VHWMR.

Action Taken: The facility was able to provide a list of job titles of positions currently filled by facility personnel who are involved with hazardous waste management for the facility. This was reviewed during the follow-up inspection at the facility on September 14, 1996. This complies with Section 9.1.G.4.a. of the VHWMR.

3. The owner/operator has not maintained on file at the facility a record of the results of tank assessments made by a Virginia registered professional engineer. This is required under Section 9.9.D.8.c. of the VHWMR.

Action Taken: The facility had all tanks related to hazardous waste storage assessed by a Virginia registered professional engineer on January 28, 1997 (letter of certification on file with DEQ-PRO). This complies with Section 9.9.D.8.c. of the VHWMR.

**B. FACILITY SAFETY:**

The facility did not have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment during emergencies. This is required under Section 9.2.E. of the VHWMR.

Action Taken: During the follow-up inspections of September 16, 1996, November 26, 1996 and March 6, 1997 it was noted by inspectors that all aisle ways at or near points of hazardous waste generation and the accumulation areas were clear and unobstructed. This complies with Section 9.2.E. of the VHWMR.

**C. USE AND MANAGEMENT OF CONTAINERS FOR 90 DAY ACCUMULATION AREAS:**

1. The generator facility did not have a record of inspection of the accumulation area at the facility in an inspection log. This is required under Sections 6.4.E.1.d. and 9.1.F.4. of the VHWMR.

Action Taken: It was discussed during the follow-up inspection on September 16, 1996 with facility representatives, that certain changes would have to be made in the language regarding the inspection log currently being used at the facility. A copy of the amended log was received on September 16, 1996 from Mr. Timothy Yehl (Plating Manager). This log contained the amended language and is attached to the inspection report. This complies with Section 6.4.E.1.d. and 9.1.F.4. of the VHWMR.

2. The generator did not have containers labeled or marked clearly with the words "Hazardous Waste". This is required under Section 6.4.E.1.c. of the VHWMR.

Action Taken: Upon inspection of the facility on September 16, 1996 inspectors noted that all containers containing hazardous waste were properly labelled with the words "Hazardous Waste". This complies with Section 6.4.E.1.c. of the VHWMR.

3. All containers holding hazardous waste were not kept closed during storage. This is required under Section 9.8.D.1. of the VHWMR.

Action Taken: During the follow-up inspection on September 16, 1996 it was noted by inspectors that all containers containing hazardous waste were closed. In the case of satellite containers, proper bungs on the drums were in place. This complies with Section 9.8.D.1. of the VHWMR.

4. Storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby were not separated by means of dikes, berms, walls or other devices. This is required under Section 9.8.G.3. of the VHWMR.

Action Taken: During the follow-up inspection of September 16, 1996, it was noted by inspectors that containers holding hazardous waste incompatible with other materials were separated by means of a completed berm around the holding area. This complies with Section 9.8.G.3. of the VHWMR.

**D. MANAGEMENT OF TANKS FOR HAZARDOUS WASTES:**

1. The secondary containment system is not constructed or lined with materials that are compatible with the waste(s) to be placed in the tank system and of sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions, stress of installation, and the stress of daily operation. This is required under Section 9.9.D.3.a. of the VHWMR.

Action Taken: The facility had completed installation of an epoxy liner in the secondary containment system which is of sufficient strength to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions, stress of installation, and the stress of daily operation. This was inspected and approved (with supporting documentation of the epoxy material) during the follow-up inspection on March 6, 1997. This complies with Section 9.9.D.3.a. of the VHWMR.

2. The secondary containment system is not provided with a leak detection system that is designed or operated so that it will detect the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours or at the earliest practicable time if existing detection technology or site conditions will not allow detection of a release within 24 hours. This is required under Section 9.9.D.3.c. of the VHWMR.

Action Taken: The facility has installed a leak detection system within the berm wall of the tanks used for storage of hazardous wastes. The leak detection system is activated when a probe is exposed to liquid rising within the berm to approximately 1 inch. The alarm is monitored 24 hours per day, seven days per week by Security Systems, Inc., located at 3314 Parham Road, Richmond, Va., and the contact person is Mr. Micky Smithers. This detection system complies with Section 9.9.D.3.c. of the VHWMR.

3. The external liner system for the tanks was not designed to contain 110% of the capacity of the largest tank within its boundary. This is required under Section 9.9.D.5.a.(1) of the VHWMR.

Action Taken: The facility's largest tank for hazardous waste storage has a capacity of 5,100 gallons. The berm constructed by the facility has the capacity to exceed 150 to 200 cubic feet of the largest tank ( 5,100 gallons) within the bermed area which is used for hazardous waste storage. This complies with Section 9.9.D.5.a.(1) of the VHWMR.

4. The external liner system for the facility's tank area was not free of gaps, as the external liner system was not continuous around the tanks. This is required under Section 9.9.D.5.a.(3) of the VHWMR.

Action Taken: It was noted in observation from the March 6, 1997 follow-up inspection that the berm wall encloses all the tanks used for hazardous waste storage. All existing gaps had been completely enclosed by the construction of a new berm wall around the hazardous waste tanks. This berm wall is constructed of cement block reinforced with rim rod and protected on the north and east sides with a reinforced metal wall. This complies with Section 9.9.D.5.a.(3) of the VHWMR.

5. For other than non-enterable underground storage tanks and for all ancillary equipment, an annual leak test or other internal inspection was not performed by an independent Virginia registered professional engineer that addresses cracks, leaks, corrosion and erosion. This was not performed annually on the facility's tank units. Facility representatives stated that Tank No. 1 (used for caustic hazardous waste) was not examined by a registered Virginia engineer after repairs were completed for a crack. This is required under Section 9.9.8.D.b. of the VHWMR.

Action Taken: The facility had all the tanks used for hazardous waste storage examined by an independent Virginia registered professional engineer. This is documented by letter to the facility with the Engineer's seal affixed to the letter. He certifies that all the tanks are free of defects and can be put into immediate use. This complies with Section 9.9.8.D.b. of the VHWMR.

6. Inspections regarding sections 9.9.F.1. (tank inspections to be completed at least once each operating day) were not documented in the facility operating record or log. This is required under Section 9.9.F.3. and 9.1.F.4. of the VHWMR.

Action Taken: The generator was able to produce a log which listed tank inspection maintained on a log starting August 9, 1996. This was examined during the follow-up inspection conducted on September 16, 1996. This complies with Section 9.9.F.3. and 9.1.F.4. of the VHWMR.

This completes all areas of non-compliance from the inspection of July 11, 1996. I want to commend you and your staff for the diligent work they have put forth in this immense project.

Your efforts to not only come into compliance with the VHWMR but to go above and beyond what was required is commendable. Thank you for doing your share to help protect the quality of the environment for the Commonwealth of Virginia.

If you have any further questions regarding this matter, please do not hesitate to contact me at (804) 527-5074.

Sincerely,

Jon D. Chinnery  
Environmental Inspector, Senior

**Enclosures**

cc: file  
Claire R. Ballard, OTA, DEQ (enclosures)  
Cathy P. Franco, Enforcement, PRO (w/o enclosures)  
Charley W. Banks, Inspector, PRO (w/o enclosures)  
David Klossner, Rehrig International, Vice President (Manufacturing) (w/o enclosures)

**MAY 15, 1998**

**LETTER FROM VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY TO  
REHRIG INTERNATIONAL**



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

James S. Gilmore, III  
Governor

**PIEDMONT REGIONAL OFFICE**  
4949-A Cox Road  
Glen Allen, Virginia 23060

Thomas L. Hopkins  
Director

John Paul Woodley, Jr.  
Secretary of Natural Resources

(804)527-5020  
Fax (804) 527-5106  
[Http://www.deq.state.va.us](http://www.deq.state.va.us)

Gerard Seeley, Jr.  
Piedmont Regional Director

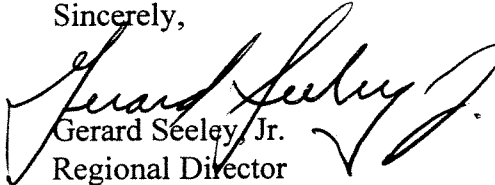
David Klossner  
Vice President of Manufacturing  
Rehrig International  
901 Lombardy Street  
Richmond, Virginia 23220

**MAY 15 1998**

Dear Mr. Klossner:

On January 23, 1997, you entered into a consent order with DEQ to resolve certain issues pertaining to hazardous waste management at Rehrig International. This letter serves as notice that all terms of the order have been met, and the order is terminated. Please continue to abide by applicable laws and regulations for the proper management of waste. If you have any questions, please contact Cathie P. Franco at (804) 527-5081. Thank you for your cooperation.

Sincerely,

  
Gerard Seeley, Jr.  
Regional Director  
Piedmont Regional Office

cc: Cathie P. Franco



5/8/98  
Date

**Dereferral of Enforcement Case**

**Piedmont Regional Office**

Facility/Owner: Rehrig International

Location: Richmond, VA

Registration No.: VAD089028377

Consent Order/CSO/  
Permit/Certificate: CO 1/23/97

Referral Date: 8/96

Violation: VHWMR violations re: tanks, secondary containment, proper job titles, adequate aisle space, HW labeling, and leak detection.

Justification for Cancellation: The order stays in effect until terminated in writing by the Director, or company petitions. Since Rehrig has complied with all terms of the order, it is appropriate for the Director to cancel the order.

Document to Justify: Inspector letter re: compliance, file.

Recommended by: Cathie Franco, En. Spec. Sr. 5/8/98  
Name Title Date

Concurrence:

Vernon C. Williams 5/8/98  
Enforcement Manager Date

Bob Dwyer 5-11-98  
Regional Compliance Manager Date

Mohammed R. Khalil May 11, 98  
Media Manager Date

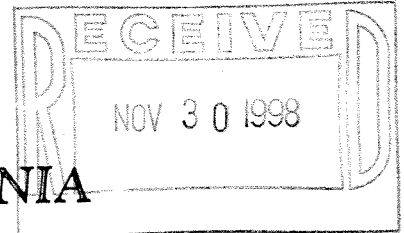
Grand Jury 5/11/98  
Regional Director Date

Copies: Charlie Stitzer, OE  
Vernon Williams, PRO  
Mohammad Habibi, PRO

Please forward to next name and return original to Cathie Franco

**NOVEMBER 25, 1998**

**LETTER FROM VIRGINIA DEPARTMENT OF WASTE MANAGEMENT TO  
REHRIG INTERNATIONAL**



COMMONWEALTH of VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL QUALITY

James S. Gilmore, III  
Governor

PIEDMONT REGIONAL OFFICE

4949-A Cox Road  
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Dennis H. Treacy  
Director

Gerard Seeley, Jr.  
Piedmont Regional Director

John Paul Woodley, Jr.  
Secretary of Natural Resources

November 25, 1998

J. Gregory Dant  
Rehrig International  
901 Lombardy Street  
Richmond, Virginia 23220

Re: Hazardous Waste Compliance Inspection  
Rehrig International, 901 Lombardy St., Richmond  
EPA ID # VAD 089028377

Dear Mr. Dant:

Thank you for your cooperation during the Hazardous Waste Management Compliance inspection conducted November 17, 1998 at the above-referenced facility. During this inspection, the facility was evaluated for compliance with the Virginia Hazardous Waste Management Regulations (VHWMR) as a Large Quantity Generator (LQG). A copy of the survey sheet and checklists completed during the inspection are enclosed for your information. The facility was in compliance with the VHWMR.

Thank you for your efforts to maintain a safe environment in the Commonwealth of Virginia. Please call me at 804-527-5132 if you have any questions regarding this matter.

Sincerely,

Charley Banks  
Compliance Division

Enclosures

cc: Claire Ballard, OTA  
File

# DEPARTMENT OF ENVIRONMENTAL QUALITY PIEDMONT REGIONAL OFFICE

## SURVEY SHEET FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY: Rehrig International  
ADDRESS: 901 Lombardy Street, Richmond  
EPA ID NUMBER: VAD 089028377  
FACILITY REPRESENTATIVE: Mr. Greg Dant  
TITLE: Technical Process Supervisor  
TELEPHONE NUMBER: 804-355-7864  
INSPECTOR'S NAME: Charley Banks  
TITLE: Env. Insp. Sr.  
DATE of INSPECTION: November 17, 1998

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1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.)  
Manufacture shopping carts (building and plating the frames creates the haz. waste)
2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.  
Sludge from nickel plating process (F006, D007)  
waste acid (D002, D007)  
waste alkaline (D002, D007, D008)

3. List the highest amounts of hazardous waste generated in any month of the calendar year and the greatest amount accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
D002	36,312 pounds	36,312 pounds
D002, D007	214,382 pounds	64,512 pounds
F006	27,000 pounds	27,000 pounds
D002, D007, D008	115,402 pounds	60,830 pounds

4. Does the facility ever generate greater than:  
1 kg. of acutely toxic waste (P listed waste or  
F020-F023 and F026-F027)? NO

100 kg of clean-up from a spill of P listed waste  
or F020-F023 and F026-F027 waste? NO

If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent?  
(List all transporters and facilities, or on-site treatment performed).

Transporter: Clean Harbors (MAD039322250), Envirite (PAD010154045)  
Facilities: Clean Harbors (OHD000724153, CTD000604488), Envirite  
(PAD010154045)

6. Does the facility generate any hazardous waste  
that is excluded from regulation? If yes,  
list the waste and the basis for exclusion. YES

Waste muriatic acid is neutralized in the WWTP, and sewered under the authority of a pretreatment permit with the City of Richmond.

7. Does the facility: **Generate** **Market** **Burn** NO  
used oil that is burned for energy recovery? **Underline or circle**  
**all that apply.** (If the facility **markets** or burns used oil, fill  
out the **Used Oil Checklist.**) Does the generator of used oil to  
be burned for energy recovery (other than a **Conditionally Exempt**  
**Small Quantity Generator**) mix the used oil with hazardous waste? NO  
If YES, then fill out the **Used Oil Checklist.**

8. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these?

NO

If Yes, list the waste, where it is sent, and complete the **Metals Recovery Checklist**.

9. Does the facility generate, transport, store, collect or reclaim spent lead-acid batteries? If yes, underline or circle all that apply. If the facility stores batteries before reclaiming them, complete the **Metals Recovery Checklist**.

NO

10. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. small quantity generator
- c. generator
- d. permitted or interim status TSD
- e. unpermitted TSD (explain in comments section)
- f. transporter
- g. other: please explain \_\_\_\_\_

[Underline or Circle All That Are Applicable]

Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55-gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

12. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

Location	Number of Containers/Tanks
< 90-day area	7 cu yd bags F006
	5 55-gal drums F006
	3 55-gal drums D007
< 90-day tanks	2 3300-gal tanks
	1 4200-gal tank
	2 5000-gal tanks

13. Comments:

14. Waste Management Flow Diagram:

(On this page sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

Plating operations--> wastewater--> WWTP--> filter press --> treated water to POTW  
↓  
Sludge ----> 90-day area ---> transporter

Waste acid or caustic with chrome ---> 90-day tanks ---> transporter

# DEPARTMENT OF ENVIRONMENTAL QUALITY PIEDMONT REGIONAL OFFICE

## CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF LARGE QUANTITY GENERATORS (LQG)

FACILITY NAME: Rehrig International

EPA ID NUMBER: VAD 089028377

INSPECTION DATE: November 17, 1998

NOTE: \* means Non-Compliance

### VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

PART/ SECTION	REGULATION	YES	NO	N/A
6.3.	1. Is a manifest system currently being used for all hazardous waste shipped off site?	X		
6.2.C.	2. Has the generator determined that the facility has an EPA ID number?	X		
5.5.A.7.	3. Has the generator determined that the transporter has a valid EPA ID number and a valid Virginia Transporter permit?	X		
6.3. 5.3.B.	4. Is the following information on the manifest:			
5.3.B.1.	A. The generator's name, mailing address, EPA ID number, and telephone number?	X		
5.3.B.2.	B. A unique five digit number assigned to the manifest by the generator?	X		
5.3.B.3.	C. The total number of pages of the manifest?	X		
5.3.B.4.	D. The company name and EPA ID number of each transporter used?	X		
5.3.B.5.	E. The company name, site address, and EPA ID number of the facility designated to receive the waste?	X		
5.3.B.6.	F. The U.S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material?	X		
5.3.B.7.	G. The quantities of waste being shipped? and	X		



PART/ SECTION	REGULATION	YES	NO	N/A
6.4.E.1.d. 9.2.B. 9.2.D.	12. At the facility, is the following equipment installed:			
9.2.B.1.	A. An internal communications or alarm system capable of providing immediate emergency instruction to facility personnel if the hazardous waste generation or accumulation areas are threatened by hazardous waste release, fire or explosion?	X		
9.2.B.2.	B. A device (at the scene of hazardous waste generator operations) capable of summoning emergency assistance from Police, Fire Departments, etc.?	X		
9.2.B.3.	C. Portable fire extinguishers, fire control equipment and decontamination equipment? and	X		
9.2.B.4.	D. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system?	X		
9.2.C.	13. Is the above equipment tested and maintained as necessary to assure proper operation and is a record of the tests and inspections maintained on a log at the facility?	X		
9.2.E.	14. Does the facility have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies?	X		
6.4.E.1.d. 9.1.F.4.	15. Does the generator record inspections of the accumulation area at his facility in an inspection log?	X		
9.2.F.1.	16. Has the facility attempted to arrange agreements with the local authorities such that:			
9.2.F.1.a.	A. The police, fire and emergency response teams are familiar with the layout of the site, the properties of the hazardous waste handled at the site, normal working areas, entrances to roads inside the facility and possible evacuation routes?	X		
9.2.F.1.b.	B. Where more than one police and fire department might respond to an emergency, do agreements specify a primary emergency authority?			X
9.2.F.1.c.	C. Agreements with Commonwealth emergency response teams, emergency response contractors and equipment suppliers are specified? and	X		
9.2.F.1.d.	D. The local hospital is familiar with the properties of the hazardous wastes handled and the types of injuries or illnesses which could result from fires, explosions, or releases?	X		
6.4.E.1.d. 9.3.A.1.	17. Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water?	X		
9.3.B.	18. Does the contingency plan contain the following elements:			

PART/ SECTION	REGULATION	YES	NO	N/A
9.3.B.(1,2)	A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water?	X		
9.3.B.3.	B. A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams to coordinate emergency services, as required?	X		
9.3.B.4.	C. A listing of names, addresses, and office and home phone numbers of all persons qualified to act as emergency coordinator? List primary Coordinator.  NAME: Paul Bauz TITLE: Emergency Coordinator PHONE: Home 804-262-2268 Office 804-355-7864	X		
9.3.B.5.	D. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? Does this list of emergency equipment specify the location and physical description of each item on the list and a brief outline of its capabilities?	X		
9.3.B.6.	E. An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? and	X		
9.3.C.2.	F. Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? *** PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS".	X		
9.3.F.	19. Has the contingency plan ever been implemented?		X	
9.3.F.(9,10)	20. If yes, was a written report filed with the Director within 15 days and were the Director and other required authorities properly notified before operations resumed?			X
6.5.A.1., 2., & 3.	21. Does the generator retain copies of all manifests, annual reports, exception reports, test results, and waste analysis for at least three Years?	X		
6.5.B.1.	22. Has the facility submitted an annual report for the preceding calendar year by March 1?	X		
6.4.E.7.	23. Does the generator who manages HW prohibited under Part XV treat waste in tanks and containers? If yes, must meet requirements of 6.4.E. and 15.1.G.1.d.		X	
15.1.G.1.d.	24. If the generator treats waste in tanks or containers, has the generator developed a written waste analysis plan and kept on-site in the generator's records. Has the generator filed a plan with director at least 30 days prior to treatment.			X
6.5.D.	25. Has the generator ever submitted a release report if responsible for release of HW which threatens public health. (Must notify NRC, local Government, the Department.)		X	

PART/ SECTION	REGULATION	YES	NO	N/A
6.4.E.2.	26. Does the generator accumulate (store) hazardous waste in containers or tanks on-site for greater than 90 days? If yes, interim status or a TSD permit is required. (Up to a 30 day extension may be granted by the Director.)		X	
6.4.E.1.e.	27. Has the generator notified the Executive Director by March 1, 1988, of the exact location of the existing container and tank accumulation areas, and at least 15 days prior to use for subsequently established accumulation areas?	X		
6.4.E.1.a.(1) 9.8.	28. The Use and Management of Containers for 90 Day Accumulation Areas:			
6.4.E.1.a 9.8.B.	29. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? If No, list the accumulation areas where there are problems and the type of problems. *** PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS".	X		
6.4.E.1.a. 9.8.C.	30. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?	X		
6.4.E.1.b.	31. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container?	X		
6.4.E.1.c.	32. Is the container labeled or marked clearly with the words "Hazardous Waste".	X		
9.8.D.1.	33. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste? If No, list the locations where open containers are found. *** PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS."	X		
9.8.E.	34. Are the areas where hazardous waste containers are stored inspected by the owner/operator at least weekly?	X		
9.8.F.	35. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line?	X		
9.8.G.1.	36. Are incompatible wastes placed in separate containers?		X	
9.8.G.3.	37. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices?		X	
6.4.E.3.a.	38. Does the generator have satellite accumulation areas where up to 55 gal of any one type of HW (1 QT acutely HW) are accumulated? If yes,		X	
6.4.E.3.a.	A. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?			X
6.4.E.3.a.(1) 9.8.B.	B. Are the containers in good condition?			X
6.4.E.3.a.(1) 9.8.C.	C. Are the containers compatible with the waste?			X

PART/ SECTION	REGULATION	YES	NO	N/A
6.4.E.3.a.(1) 9.8.D.1.	D. Are the containers kept closed except as necessary to add or remove waste?			X
6.4.E.3.a.(2)	E. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container? and			X
6.4.E.3.b.	F. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,			X
6.4.E.3.b.	1) Has the generator marked the excess amount with the date the excess amount began accumulating?			X
6.4.E.3.b.	2) Has the generator either removed the excess amount within three days of the date of excess accumulations or has he complied with all other provisions for accumulation areas? Namely, has he notified the Executive Director about the location of the accumulation area?			X
	39. PLEASE LIST ANY NEWLY REGULATED WASTE THAT IS NOT LAND RESTRICTED (such as D018-D043, F032, F034 or F035) ON THE LAST PAGE UNDER "COMMENTS".			
15.1.A.2.	40. Does the facility generate, transport, treat, store or dispose any land-restricted wastes? (See VHWMR Part 15) ***	X		
15.1.A.3.	41. Is land disposal of wastes occurring? If yes,		X	
15.1.A.3.a.	A. Has the facility been granted an extension to the effective date for land restriction applicable to its restricted waste? OR			X
15.1.A.3.b.	B. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR			X
15.1.A.3.c.	C. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?			X
15.1.E.	42. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?		X	
15.1.F.	43. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?		X	
15.1.C.1.	44. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?		X	

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.D.1.	45. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)		X	
	46. If yes, does the facility meet the following requirements:			
15.1.D.1.b. 15.1.G. 15.3.C. 15.4. 15.3.	A. Are the residues of the treatment analyzed as specified in VHWMR § 15.1.G. or § 15.3.C. to determine if they meet the applicable treatment standards or VHWMR § 15.4. or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR § 15.3?			X
15.1.D.1.c. 9.10.B.1. 10.10.B.3.	B. Has the owner/operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liner?			X
15.1.D.1.c. 10.5.	C. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR § 10.5?			X
15.1.D.1.d.	D. Has the owner/operator submitted a written certification to the Executive Director that the requirements of 15.1.D.1.c. have been met which states: "I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted wastes. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment." and			X
15.1.D.1.d.	E. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification?			X
15.1.G.1.a.	47. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?	X		
	48. Did the notification include the following information:			
15.1.G.1. a.(1)	A. EPA Hazardous Waste Number?	X		
15.1.G.1. a.(2)	B. The corresponding treatment standards and all applicable prohibitions set forth in VHWMR § 15.3.C.?	X		
15.1.G.1. a.(3)	C. The manifest number associated with the shipment of waste? and	X		
15.1.G.1. a.(4)	D. Waste analysis data, where available?	X		

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.G.1.b.	49. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR § 15.3.C.?			X
	50. Did the notification include the following information:			
15.1.G.1.b.(1)(a)	A. EPA Hazardous Waste Number?			X
15.1.G.1.b.(1)(b)	B. The corresponding treatment standards and all applicable prohibitions?			X
15.1.G.1.b.(1)(c)	C. The manifest number associated with the shipment of waste? and			X
15.1.G.1.b.(1)(d)	D. Waste analysis date, where available?			X
15.1.G.1.b.2.	51. Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR § 15.4. and all applicable prohibitions set forth in VHWMR § 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."			X
15.1.G.1.c.	52. Has the generator received a case-by-case exemption on restricted waste, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?		X	
15.1.G.1.g.	53. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	X		
15.5.	54. Is the generator storing land restricted waste? (For one year storage only)		X	
15.5.1.a.	55. If yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?			X

COMMENTS:

# DEPARTMENT OF ENVIRONMENTAL QUALITY

## PIEDMONT REGIONAL OFFICE

### CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF TANKS

FACILITY NAME: Rehrig International

EPA ID NUMBER: VAD 089028377

INSPECTION DATE: November 17, 1998

NOTE: \* means Non-Compliance

#### VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

PART/ SECTION	REGULATION	YES	NO	N/A
6.4.E.1.e.	1. Has the generator notified the Executive Director of the location of all hazardous waste tank accumulation areas?	X		
	A. List all of the tank accumulation areas and give a brief description of each one in the Comment Section. Include the age of each tank, if Known and the type of waste accumulated.			
6.4.E.2.	B. Is the tank used to accumulate hazardous waste for greater than 90 days? If YES,		X	
	C. Then has the facility applied for a hazardous waste Storage Permit? ( If NO, complete the Unauthorized Facility Checklist).			X
6.4.E.1.c.	2. Is each tank marked with the words "Hazardous Waste"?	X		
9.9.A.1.	3. Is the tank used to store or treat hazardous waste that contains no free liquids as demonstrated by the Paint Filter Liquids Test (i.e., solids only)? If yes, exempted from 9.9.D.(Items # 5-15 below.)		X	
9.9.A.2.	4. Does the tank (including sumps) serve as part of a primary secondary containment system to collect or contain releases of hazardous waste? If yes, exempted from 9.9.D.(Items # 5-15 below.)		X	
9.9.D.1.	5. Has secondary containment been provided for each of the following units in order to prevent the release of HW to the environment:			
9.9.D.1.a.	A. New tank systems installed since January 1, 1988?	X		
9.9.D.1.b.	B. Existing tanks used to store or treat F020, F021, F022, F023, F026, or F027?			X
9.9.D.1.c.	C. Existing tanks whose documented age is greater than fifteen years of age?			X

PART/ SECTION	REGULATION	YES	NO	N/A
9.9.D.1.c.	D. Existing tanks whose documented age is less than fifteen years of age? If yes, when will the tank become fifteen years old? *** PLEASE REMARK ON THE LAST PAGE UNDER "COMMENTS".			X
9.9.D.1.d.	E. Existing tanks for which the age cannot be documented within eight years of January 12, 1987? But, if facility is greater than 7 years old, by time reaches 15 year old? If yes, when will the facility become fifteen years old? *** PLEASE REMARK ON THE LAST PAGE UNDER "COMMENTS". and			X
9.9.D.1.e.	F. Tank systems that store or treat materials that become hazardous wastes subsequent to January 12, 1987, within time intervals required in §9.9.D.1.a. through 9.9.D.1.d.?			X
9.9.D.2.	6. Does the secondary containment provided for units above meet the following requirements:			
9.9.D.2.a.	A. Is the secondary containment designed, installed and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, groundwater, or surface water at any time during the use of the tank system?	X		
9.9.D.2.b.	B. Is the secondary containment system capable of detecting and collecting any releases and accumulated liquids until the collected material can be removed?	X		
9.9.D.3.a.	C. Is the secondary containment constructed of or lined with materials that are compatible with the waste(s) to be placed in the tank system and of sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions, stress of installation, and the stress of daily operation?	X		
9.9.D.3.b.	D. Is the secondary containment placed on a foundation or base capable of providing support to the secondary containment system and resistance to pressure gradients above and below the system owing to settlement, compression or uplift?	X		
9.9.D.3.c.	E. Is the secondary containment provided with a leak-detection system that is designed or operated so that it will detect the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours or at the earliest practicable time if the existing detection technology or site conditions will not allow detection of a release within 24 hours? and	X		
9.9.D.3.d.	F. Is the secondary containment system sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills, or precipitation, and has waste that has spilled or leaked and accumulated precipitation been removed from the secondary containment within 24 hours or in as timely a manner as possible to prevent harm to human health or the environment?	X		
9.9.D.4.	7. Does the secondary containment for the tanks consist of one or more of the following:			



PART/ SECTION	REGULATION	YES	NO	N/A
9.9.D.4.a.	A. A liner (external to the tank);	X		
9.9.D.4.b.	B. A vault;		X	
9.9.D.4.c.	C. A double-walled tank; OR		X	
9.9.D.4.d.	D. An equivalent device as approved by the Director?		X	
	FOR EXTERNAL LINER SYSTEMS ONLY:			
9.9.D.5.a.	8. Is the external liner system:			
9.9.D.5.a.(1)	A. Designed or operated to contain 100% of the capacity of the largest tank within its boundary;	X		
9.9.D.5.a.(2)	B. Designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system unless the collection system has sufficient excess capacity to contain the precipitation from a 25 year, 24 hour rainfall event?	X		
9.9.D.5.a.(3)	C. Free of cracks or gaps? and	X		
9.9.D.5.a.(4)	D. Designed and installed to completely surround the tank and to cover all surrounding earth likely to come into contact with the waste if released from the tank?	X		
	FOR VAULT SYSTEMS ONLY:			
9.9.D.5.b.	9. Is the vault system:			
9.9.D.5.b.(1)	A. Designed or operated to contain 100% of the capacity of the largest tank within its boundary?			X
9.9.D.5.b.(2)	B. Designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system unless the collection system has sufficient capacity to contain the precipitation from a 25 year, 24 hour rainfall event?			X
9.9.D.5.b.(3)	C. Constructed with chemical-resistant water stops in place at all joints (if any)?			X
9.9.D.5.b.(4)	D. Provided with an impermeable interior coating or lining that is compatible with stored waste that will prevent migration of waste into the concrete?			X
9.9.D.5.b.(5)	E. Provided with a means to protect against the formation of and ignition of vapors within the vault, if the waste being stored or treated is ignitable or reactive? and			X
9.9.D.5.b.(6)	F. Provided with an exterior moisture barrier or be otherwise designed or operated to prevent migration of moisture into the vault if the vault is subject to hydraulic pressure?			X
	FOR DOUBLE-WALLED TANKS ONLY:			
9.9.D.5.c.	10. Is the double-walled tank:			
9.9.D.5.c.(1)	A. Designed as an integral structure (i.e., an inner tank with an outer shell) so that any release from the inner tank is contained by the outer shell;			X

PART/ SECTION	REGULATION	YES	NO	N/A
9.9.D.5.c.(2)	B. Protected, if constructed of metal, from both corrosion of the primary tank interior and the external surface of the outer shell; and			X
9.9.D.5.c.(3)	C. Provided with a built-in, continuous leak detection system capable of detecting a release within 24 hours or at the earliest practicable time?			X
	11. FOR ALL TANK UNITS:			
9.9.D.6.	12. Does the tank system have ancillary equipment?	X		
9.9.D.6.	13. If yes, does the ancillary equipment have secondary containment (e.g., trench, jacketing, double-walled piping) which meets the requirements above? If no, PLEASE EXPLAIN ON THE LAST PAGE UNDER "COMMENTS".	X		
9.9.D.8.	14. For all tank systems for which secondary containment meeting the above requirements has not yet been provided, has the facility complied with the following for the units:			
9.9.D.8.a.	A. For non-enterable underground tanks, has a leak test been conducted at least annually?			X
9.9.D.8.b.	B. For other than non-enterable underground tanks and for all ancillary equipment, an annual leak test or other internal inspection or other tank integrity examination by an independent, Virginia registered professional engineer that addresses cracks, leaks, corrosion and erosion conducted at least annually? and	X		
9.9.D.8.c.	C. Has the owner/operator maintained on file at the facility a record of the results of the above assessments?	X		
9.9.D.8.d.	15. If found to be leaking or unfit for use, owner/operator shall comply with 9.9.G. (Item # 24) below.			
9.9.B.1.	16. For each existing tank system which does not have secondary containment meeting the requirements of VHWMR Section 9.9.D., has the owner/operator determined that the tank system is not leaking or is unfit for use?			X
	17. If yes, is a copy of this written assessment reviewed and certified by an independent Virginia registered professional engineer and kept on file at the facility? (If found to be leaking, must comply with 9.9.G.). (Item # 24 below).			X
9.9.E.2.	18. Has the owner/operator used appropriate controls and practices to prevent spills and overflows from tank or secondary containment systems, including:	X		
9.9.E.2.a.	A. Spill prevention controls (e.g., check valves, dry disconnect couplings)? *** DESCRIBE ON THE LAST PAGE UNDER "COMMENTS".	X		
9.9.E.2.b.	B. Overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank)? DESCRIBE ON THE LAST PAGE UNDER "COMMENTS". and,	X		

PART/ SECTION	REGULATION	YES	NO	N/A
9.9.E.2.c.	C. Maintenance of sufficient freeboard in uncovered tanks to prevent overtopping by wave or wind action or by precipitation?	X		
9.9.E.3.	19. Owner/operator shall comply with 9.9.G. below if a leak or spill occurs.			
9.9.F.1.	20. Does the owner/operator inspect the following at least once each operating day:			
9.9.F.1.a.	A. Overfill/spill control equipment (e.g., waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order?	X		
9.9.F.1.b.	B. The aboveground portions of the tank system, if any, to detect corrosion or releases of waste?	X		
9.9.F.1.c.	C. Data gathered from monitoring equipment and leak detection equipment (e.g., pressure and temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design; and			X
9.9.F.1.d.	D. The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures to detect erosion or signs or releases of hazardous waste?	X		
9.9.F.2.	21. For all underground and in-ground hazardous waste storage tanks, are cathodic protection systems present?			X
	22. If yes, is the cathodic protection inspected according to the following schedule:			
9.9.F.2.a.	A. The proper operation of the cathodic protection system shall be confirmed within six months after initial installation, and annually thereafter; and			X
9.9.F.2.b.	B. All sources of impressed current shall be inspected and/or tested, as appropriate, at least bimonthly (i.e., every other month):			X
9.9.F.3. 9.1.F.4.	23. Are the inspections in 9.9.F.1. and 9.9.F.2. documented in the facility operating record or log?	X		
9.9.G.	24. For tank systems or secondary containment which have been determined to be leaking or unfit for use, or from which there has been a leak or spill, has the owner/operator satisfied the following requirements:			
9.9.G.1.	A. Has the owner/operator immediately stopped the flow of hazardous waste into the tank system or secondary containment and inspected the system to determine the cause of release?			X
9.9.G.2.a.	B. For releases from the tank system, has the owner/operator within 24 hours or at the earliest practicable time, removed as much of the waste as is necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system?			X

PART/ SECTION	REGULATION		YES	NO	N/A
9.9.G.2.b.		C. For releases to a secondary containment system, have all released materials been removed within 24 hours or in as timely manner as is possible to prevent harm to human health and the environment?			X
9.9.G.3.a.		D. Has the owner/operator prevented further migration of the leak or spills to soils or surface water? and			X
9.9.G.3.b.		E.. Has the owner/operator removed and properly disposed of any visible contamination of the soil or surface water?			X
9.9.G.4.a.	25.	Have all releases to the environment been reported to the Director within 24 hours of detection?			X
9.9.G.4.c.	26.	Within 30 days of detection of release, has a report been submitted to the Director?			X
	27.	If yes, did the report contain the following information:			
9.9.G.4.c.(1)		A. Likely route of migration of the release?			X
9.9.G.4.c.(2)		B. Characteristics of the surrounding soil?			X
9.9.G.4.c.(3)		C. Results of any monitoring or sampling conducted in connection with the release, if available, or as soon as they became available?			X
9.9.G.4.c.(4)		D. Proximity to downgradient drinking water, surface water, and population areas; and			X
9.9.G.4.c.(5)		E. Description of response actions taken or planned?			X
9.9.G.5.c.	28.	If the cause of the release was a leak from the primary tank system into the secondary containment system, was the system repaired prior to returning the tank system to service?			X
9.9.G.5.d.	29.	If the cause of the release was a leak to the environment from an underground or on-ground component of a tank system without secondary containment, did the owner/operator provide secondary containment before returning the unit to service?			X
9.9.G.5.d.	30.	If the cause of the release was a leak to the environment from an aboveground component of a tank system without secondary containment, was the component visually inspected and repaired?			X
9.9.G.6.	31.	For all units which have been repaired, if any, did the owner/operator obtain certification from an independent, Virginia registered professional engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system prior to returning the unit to service?			X
9.9.H.1.	32.	At closure of any hazardous waste tank system, did the owner/operator remove or decontaminate all hazardous waste residues, contaminated containment system components, contaminated soil, and structures and equipment contaminated with waste, and manage them as hazardous waste?			X

PART/ SECTION	REGULATION	YES	NO	N/A
9.9.I.	33. Are ignitable or reactive wastes placed in the tank system? If yes,		X	
9.9.I.1.a.	A. Was the waste treated, rendered or mixed before or immediately after placement in the tank system so that the resulting waste, mixture or dissolved material no longer meets the definition of ignitable or reactive waste; OR			X
9.9.I.1.b.	B. The waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react; OR			X
9.9.I.1.c.	C. The tank system is used solely for emergencies?			X
9.9.I.2.	D. Does the owner/operator comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys or an adjoining property line as required in NFPA's "Flammable and Combustible Liquids Code"?			X
9.9.J.1.	34. Are incompatible wastes, or incompatible wastes and materials placed in the same tank system?		X	
9.9.J.2.	35. If yes, was the tank and all related equipment decontaminated first?			X
	For Treatment,Storage Facilities only.			
9.9.K.	36. If yes, does the facility meet the following requirements:			
9.9.K.1.	A. Did the owner/operator first conduct waste analyses and trial treatment or storage tests?			X
9.9.K.2.	B. Did the owner/operator obtain written, documented information on similar waste under similar operating conditions to show that the proposed treatment or storage will not cause the tank, ancillary equipment or the secondary containment to rupture, leak, corrode or otherwise fail?			X

#### COMMENTS:

There are five tanks for the <90-day accumulation of hazardous waste: 2 @ 3300 gallons, 1 @ 4200 gallons, and 2 @ 5000 gallons. They were installed in 1997.

**SEPTEMBER 23, 2003**

**INTERNAL MEMORANDUM – VIRGINIA DEPARTMENT OF  
ENVIRONMENTAL QUALITY**



41650


DEPARTMENT OF ENVIRONMENTAL QUALITY  
*Piedmont Regional Office*

4949-A Cox Road, Glen Allen, VA 23060-6296

804/527-5020

**MEMORANDUM**

**TO:** Dan Gwinner  
DEQ-CO Office of Waste Programs

**FROM:** Leanne Raynor, Compliance Inspector 

**DATE:** September 23, 2003

**SUBJECT:** Unannounced inspection of Rehrig International  
901 N. Lombardy Street and deactivation of EPA I.D. Number  
VAD089028377

**SUMMARY:**

On Wednesday September 10, 2003, DEQ-PRO conducted an unannounced inspection of Rehrig International, at 901 N. Lombardy Street, Richmond, VA 23220. Rehrig International no longer occupies the site. Rehrig International is currently listed in RCRAInfo as a Large Quantity Generator (LQG). The previous DEQ inspection was conducted on November 17, 1998.

According to Mr. Tommy Bell, Superintendent with KBS, Site contractor, the responsibility for the site was turned over this month to Kroger, which plans to open a grocery store in mid-October 2003. KBS is located at 8050 Kimway Drive, Richmond, VA 23228. The phone number is (804) 262-0100. Mr. Bell will provide DEQ-PRO contact information to the Kroger manager. The information for the Kroger contact was not available at the time of the inspection.

Please deactivate the number at this site. Rehrig is no longer at this location. The site is not currently generating any hazardous waste.

If you need any clarification, or additional information, please call me at (804) 527-5122.

PRO Hazardous Waste file - 41650 rpt

## Rev 9/02 WEM

Handler's EPA ID Number: <b>VAD089028377</b>		RCRA Non-Notifier: Yes		No X		(If Yes, the Handler section must be completed.)	
Handler's Name: <b>REHRIG INTERNATIONAL</b>							
Physical Address: <b>901 N LOMBARDY ST.</b>		City: <b>RICHMOND,</b>		State: <b>VA</b>		Zip Code: <b>23220</b>	
Mailing Address:		City:		State:		Zip Code:	
County or County Code:		Contact/Title:					
Universe Change Required: Yes X No		Indicate the RCRA Generator Universe Status of a RCRA Non-Notifier:					
Indicate the facility's current Generator Universe: <b>LQG</b>							
Indicate the facility's NEW Generator Universe: <b>CLOSED</b>							
Indicate the NEW Transporter Status: Transporter:		Non-Transporter:		Mode: Air		Rail: Water: Highway:	
Comments: <b>PLEASE DEACTIVATE EPA ID NUMBER. FACILITY IS CLOSED AT THIS LOCATION AND RELOCATED. NOT GENERATING HW.</b>							
EVALUATION		Add: X		Change:		Delete:	
Agency: <b>S</b>		Type: <b>CEI</b>		Reason:		Branch: <b>PRO</b>	
				Date: <b>9/10/03</b>		Number:	
				Person: <b>VALR</b>			

Areas of Evaluation (Mark the Areas Evaluated with an "X")												
GGR	GLB	GMR	GOR	GPT X	GRR	GSC	GSQ	UOR	SCC	TGR	TMR	
TOR	TWD	DCH	DCL	DCP	DFR	DGS	DGW	DLB	DLF	DLT	DMC	
DMR	DOR	DPB	DPP	DSI	DTR	DTT	DWP	DIN	DIA	DPS	DOP	
DMI	BRR	BPS	BIS	BCE	BDT	CAS	FEA	CSS				

Comments: **THE FACILITY CEASED OPERATION AND RELOCATED.**

[illegible][illegible]